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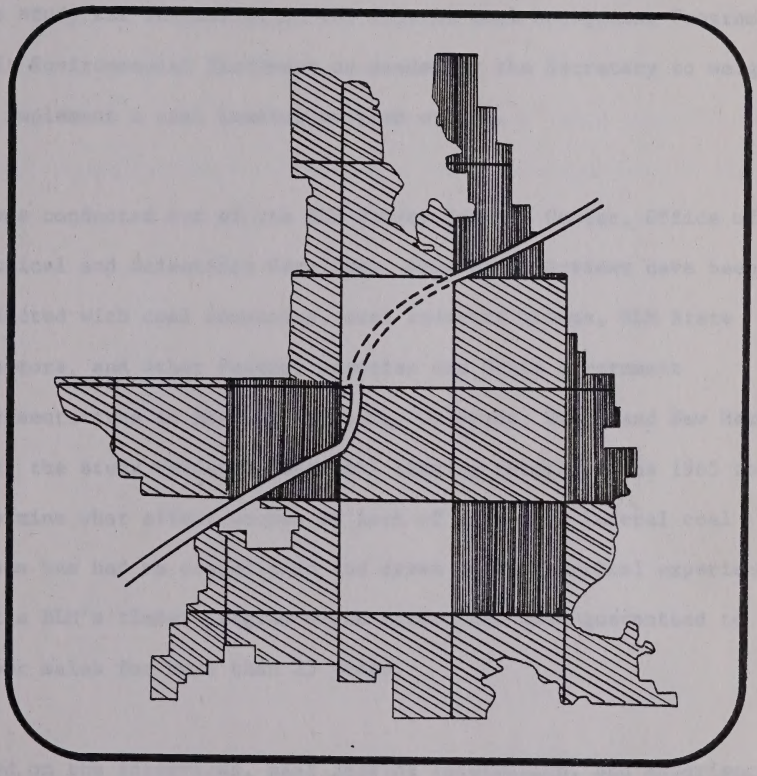

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EXECUTIVE SUMMARY OF

A STUDY OF GUARANTEED ACCESS

TO COMPETITIVE COAL LEASES

This study was identified in the Federal Coal Management Program Draft Environmental Statement as needed by the Secretary to weigh and implement a coal leasing program option.

It was conducted out of the BLM Denver Service Center, Office of Technical and Scientific Services. Over 25 interviews have been conducted with coal companies, coal industry groups, BLM State Directors, and other Federal agencies and State government representatives in Montana, Wyoming, Colorado, Utah, and New Mexico. Also, the study reviewed past coal leasing records since 1965 to determine what effect access or lack of access to Federal coal leases has had on competition and draws on the parallel experiences in the BLM's timber program where access has been guaranteed to timber sales for more than 25 years.

Based on the interviews, past leasing information, and experience, the study concludes that guaranteed access to Federal coal leases will help foster competition, assure receipt of fair market value

for the Federal coal, and protect the environment by more effective transportation systems planning.

The Secretary of the Interior has authority under FLPMA of 1976, Section 205, to acquire access to public lands or interests in lands through purchase of easements, negotiation of right-of-way agreements, exchange of lands, donations, or condemnation. It is expected that most access across non-Federal lands could be secured through purchase of easements and/or negotiations of right-of-way agreements, or through the Secretary's support of acquisitions by private companies to reach the Federal coal.

A STUDY OF GUARANTEED ACCESS TO COMPETITIVE COAL LEASES

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A STUDY OF GUARANTEEING ACCESS TO COMPETITIVE COAL LEASES

I. Introduction

The "Federal Coal Management Program Draft Environmental Statement" (Pages 3-35 and 43) identified the need for further study of the question of guaranteeing access to competitive coal leases. On December 6, 1978, the BLM Office of Coal Management (140) established a study team and requested the study by August 31, 1979. (Appendix I)

A. Purpose of the Study

Assured access was one of the major issues that surfaced in an issue paper forwarded to the Secretary during preparation of the Draft Environmental Statement. (Appendix II) Accordingly, on July 28, 1978, the Under Secretary decided to hold the matter Status Quo until the issue could be fully studied and presented for a timely decision. (Appendix III) The purpose of the study is to provide the Secretary with information so that an informed decision can be made on whether or not to guarantee access to competitive coal leases.

A STUDY OF GUARANTEEING ACCESS TO COMPETITIVE COAL LEASES

I. Introduction

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B. Organization of the Study

The study team developed a comprehensive list of coal leasing problems to examine and information to gather. It was decided that the team would seek the best information available from governmental and non-governmental sources. Working through the appropriate BLM State Office, meetings were held with coal industry representatives, coal associations, and State Government representatives, as well as the BLM State Directors in the western coal states. Although it was recognized that the Secretary's policy decision on guaranteed access to coal leases may have an effect on Federal coal in the Eastern States, the study was confined to the five western states. It was felt that conditions found in the Eastern States due to split estates (private surface - Federal subsurface) are common to areas in the West, particularly North Dakota and Oklahoma. These areas are administered from the Montana and New Mexico BLM State Offices.

C. Scope of Study

This study examines what affects the presence or absence of guaranteed access to Federal coal may have on the coal management program. Of particular concern is the relationship between access and competition in the coal industry and receipt of fair market value. To determine

whether guaranteeing access to Federal coal leases will foster competition and help ensure a fair return to the public, information was obtained from several sources. First was a review of the bidding records of competitive coal lease sales since 1965 and an attempt to correlate bids with access. In addition, the interviews which were conducted with BLM State Directors and senior BLM staff members and representatives of state governments and industry were directed toward answering questions concerning the access issue. The interviews attempted to obtain broad-based information, judgments and opinions on questions such as:

1. How do companies presently gain access to develop Federal coal leases?
2. Do you have any information or estimate of what acquisition cost to a coal lease would be?
3. Do you feel that higher bids would be received if the Federal Government guaranteed access to the lease area?
4. Would individual companies bid on more coal leases if the Federal Government guaranteed access to the lease area?

A typical letter sent to coal companies prior to the interview is shown as Appendix IV. Also, a WO Instruction Memorandum No. 79-219 dated January 26, 1979, directed State Directors to review past

coal leasing records to ascertain certain information on past bidding practices. (Appendix V).

D. Background

1. Ownership Patterns

One of the major problems facing any land management organization (public or private) is acquiring legal access to the lands which it owns. BLM, which manages more land than any other land managing organization, is no exception.

While in some areas Bureau lands are well blocked into large parcels, there are far more areas where the intermingled nature of Bureau lands creates difficult management problems. The Government has disposed of millions of acres of land through the Homestead Act of 1862 and through literally hundreds of agricultural land laws and different types of land grants. Disposing of this land caused the character of the federally owned land to change from one of being virtually a solid block of public land, consisting of many hundreds of millions of acres, to one of less than 200 million acres of fragmented ownership in which the United States owns both the surface and subsurface or mineral estate. Relatively little of the remaining fee ownership is in large contiguous blocks. Much is in

"checkerboard" ownerships created by Railroad Grant Acts and many isolated fragments have been created by various disposal laws. Appendix VI illustrates typical ownership patterns in the West.

In addition to this fee simple ownership, millions of acres of the former public lands were disposed of through the Stockraising Homestead Act and other authorities which resulted in a status that can be characterized as a "split estate;" i.e., the surface estate is in private ownership, and the subsurface or mineral estate remains in the ownership of the United States. A great deal of energy source minerals (oil and gas, timber, coal, oil shale, etc.) is found on Bureau lands in both such fragmented ownership patterns, with much coal being located in areas where the United States owns the mineral estate only. (Appendix VII, A and B.)

In the development and utilization of most natural resources, a major factor is the means to transport the resource from its initial location to the manufacturing plant and ultimately to

the market. This is true of minerals as well as other resources. This transportation system usually involves roads, railroads, and, to a lesser extent, conveyors and slurry pipelines.

In addition to transportation, roads are also needed in connection with operation and maintenance of pipelines and transmission lines, both of which are necessary in many energy development areas. Likewise, roads often are necessary in the exploration stage prior to actual development of the mineral resource concerned.

The complicated ownership pattern which BLM administers and the variety of resources and resource management needs found on the public lands make the legal rights to reach such lands critical. An increasing number of congressional inquiries on access to oil and gas leases attests to the critical need for access. The legal right of access to develop and transport coal and other resources from public lands must be secured by BLM or the purchaser of the resource whenever crossing other than public lands.

2. Mineral Access Policy

In the past, access has not been a consideration in the Department's coal leasing program. In effect, BLM coal leases are issued on a caveat emptor basis, and the Bureau makes no claim that access to the lease exists. Both competitive and preference right leases are issued without regard to access, and it is up to the lessee to obtain a right-of-way to the tract for development and a way to remove the Federal leased coal. Although the same practice has been followed with other leasable minerals, some non-leasable minerals have been treated differently. Access must be provided by BLM to competitive sales of "common varieties" of minerals materials (such as sand, gravel, pumice, cinder, clay, etc.) as required by 43 CFR 3612.1. It appears that the Secretary is neither required to nor prohibited from assuring access to competitive coal leases.

On February 10, 1978, the Director of BLM issued Instruction Memorandum No. 78-67 which discussed "Access to BLM Mineral Lease Areas." (Appendix VIII) This memo was meant to provide interim guidance until an access policy for mineral leasing was adopted. While there are no present policies or regulatory

or statutory requirements concerning guaranteed access for the Bureau's coal leasing program, there are certain basic requirements which must be met for future coal leasing under the preferred leasing program. These requirements are common to all resource development on public lands, whether that resource is renewable or non-renewable.

1. All leases must be offered competitively.
2. All leases must be identified in, and compatible with the multiple-use plans for the area.
3. All leases must meet criteria as set-forth in National Environmental Policy Act (NEPA) and other environmental protection laws.
4. All leases must ensure a fair market value return to the United States.

3. Timber Access Policy

It has been Departmental policy to provide access for competitive sales of timber since the mid-1950's. This policy is stated in 43 CFR 5401.0-6a In addition, Departmental regulations 43 CFR 2812.0-6 require an applicant for removal of private timber to grant reciprocal rights to the United States when

such applicant acquires a right-of-way across BLM managed timber lands in western Oregon. This policy on reciprocity is extended to all public domain lands under 43 CFR 2811.0-3.

A discussion on the evolution of the Bureau's timber sale access is appropriate to see what effect it had on fostering competition, ensuring fair market value, protection of environment, and development of common transportation systems.

Prior to 1948, the BLM and its predecessor agency (the O&C Administration in western Oregon) issued timber sale advertisements for tracts of timber to which there was no assured access unless there happened to be a county or State highway adjacent thereto. Likewise, there were few contractual requirements as to roads which might be constructed or used in the logging and removal of the timber from the sale area. The successful bidder built roads to a great extent to suit individual purposes. If he, the successful bidder, were the owner of private timberlands intermingled with the Bureau timber, roads were built to serve both ownerships. If the successful bidder did not own any intermingled lands, roads would be built the

shortest and cheapest way possible to reach the nearest public road. All too often, this lack of road control by BLM led to wasteful duplication of roads, poorly located and constructed roads, and many other problems.

In addition, there was strong evidence that the lack of assured access, except that available to an operator who owned lands intermingled with the Bureau lands, resulted in the Bureau's receiving little competitive bidding for the timber offered for sale. The price restrictions imposed during World War II had been lifted prior to fiscal year 1947, and there was reasonably high demand for timber. Nevertheless, during the fiscal year ending June 30, 1947, only 20 percent of the tracts offered for sale in western Oregon received two or more bids, while 52 percent of the tracts received but a single bid at the appraised price, and 28 percent received no bids. The total price for all O&C timber sold during that fiscal year was but 22 percent above the appraised price, despite generally rising timber prices. This evidence and other factors convinced the Federal Government officials that some revisions must be made in the timber sale program. It appeared that whoever owned or controlled the lands surrounding the Bureau timber controlled the access thereto, and thus controlled the bidding on a particular tract.

There was so much public demand that the Bureau revised its policy relating to access. On June 2, 1948, the then Assistant Secretary of the Interior, C. Girard Davidson, promulgated a policy that no tract of O&C timber would be offered for bid unless each prospective bidder had an equal opportunity to bid insofar as he would have assured legal access. The Bureau instituted a policy of acquiring road easements, where needed, across lands intermingled with Bureau lands. In 1950, the Bureau promulgated revised regulations which required road right-of-way permittees in an intermingled land pattern area to grant reciprocal right-of-way agreements to the United States for use by its timber sale purchasers. Because of these regulations there was further development of planning for road systems in intermingled landownership areas, resulting in better roads both as to location and quality, as well as assured access to all bidders.

Results on bidding and prices received by the Federal Government were soon apparent. For example, during a seven-month period in 1954 and 1955, a study of results of O&C timber sales showed that 83 percent of the tracts offered for sale had received two or more bids. Only 17 percent of the tracts offered for sale received but one bid, and no tracts went

unsold. Of the 17 percent of tracts receiving one bid, the total sale price was but 7 percent above the appraised price, whereas of the 83 percent receiving two or more bids, the total price was 63 percent above the appraised price. It is apparent that guaranteed access to the successful bidder had a definite effect on increasing the prices bid. Subsequently, the Bureau also instituted a major access road construction program, in addition, to its assured access program announced earlier.

On October 12, 1962, a disastrous windstorm hit western Oregon, leaving in its wake millions of board feet of wind-thrown timber. In order to expedite the salvage of this timber, and pursuant to emergency authorities, BLM modified its policy so as to guarantee access to the extent that tracts of less than one million board feet each could be offered without assured access.

A review of Oregon State Office timber sales records shows a comparison of results of such smaller sales offered without assured access and similar smaller sales offered with assured access and reveals that tracts with access received bids totaling 23 percent higher than those without access. Again, effects of assured access on bid prices are apparent.

There was wide public acceptance of the assured access policy, and this requirement has now been in the Bureau's timber sale regulations for more than 25 years.

To summarize, a review of the Bureau's policy of assured access for timber sales and the factors which led to its development show that (1) two or more potential timber sale purchasers will competitively bid on sales when legal access to timber sale areas is assured, (2) such competitive bidding will return to the United States Treasury (and to local governments which share in receipts) an increase over the Bureau's appraised price, thus placing the Bureau in a favorable posture as to complying with OMB directives, (3) by assuring that all prospective bidders will have access to proposed sale areas, the small nontimber owning processing plants have had encouragement to remain competitive and healthy, thus becoming more efficient in production of products needed by the using public. This encouragement has also tended to reduce monopolistic control possibilities in the lumber processing industry, and (4) an extensive transportation system for both the Bureau and

intermingled lands has been developed in a much more efficient and orderly fashion. The Bureau is able to make better plans for timely and proper development and use of all its resources through the hundreds of millions of dollars' worth of roads so developed.

4. Comparison of Timber Access and Coal Access Policy Development.

There are certain similarities between the present state of the development of mineral leasing from Bureau lands and the Bureau's timber sales program of some 25 years ago. This is true even though one is a renewable resource and one is a non-renewable resource.

In particular, areas of Bureau administered lands being explored or developed for their coal resources often are intermingled with privately owned lands also being developed. Some of these private lands are interspersed with the Bureau lands in a pattern reminiscent of the classic "O&C checkerboard" of western Oregon. General locations of coal are known, but specific inventory data is not yet complete, and management plans are also incomplete. Transportation systems are relatively

unplanned, and there has been little, if any, cooperative work with adjacent landowners toward such a goal.

It has been only recently that the Bureau has become actively concerned about transportation being developed by mineral lessees. Recent Instruction Memos have established policy and procedures to enforce BLM's management control of roads built across Bureau lands by lessees. However, much still remains to be done in this respect. The situation is quite similar to that in the Bureau's timber sale program prior to 1948. To date, very little has been done with respect to improving the transportation systems being developed as they cross private lands in the mineral leasing areas. Little has been done toward cooperative road planning, and no efforts have been made toward assuring bidders legal access to mineral lease areas. It is safe to say that transportation planning with respect to mineral leasing is at about the level of 25 years ago in the BLM timbered areas.

Nevertheless, the Bureau is committed both by its own policies and by public interest to a program of multiple use management, as was the case of the western Oregon lands under the 1937 O&C Act. The private landowners

whose lands are being developed for their mineral resources often are far less interested than is a government land management agency in multiple use management.

Usually, the profit motive is the strongest management policy motivating a private firm. Such a motive does not often consider the broad spectrum of "public interest" matters which the Bureau must consider. In addition to its multiple use policies, the Bureau is required by the provisions of the National Environmental Policy Act of 1969 (NEPA) and other environmental protection laws to give full attention and concern to protection of the environment. While such legal requirements were not existent 25 years ago, the Bureau did have a greater interest in environmental protection than did most of the pivate timber landowners in the O&C area who were operating on their own lands.

The construction of roads and railroads is one of the greatest surface disturbing activities in which mankind engages. Unless such construction activities are well planned, carefully monitored, and properly administered after construction, they can and will result in a great

deal of environmental degradation, including both physical and visual pollution. They will also result in conflicts with other uses of the concerned areas, sometimes to the extent of destroying one or more other actual or potential uses. An example is the silting of a stream and the resulting destruction of the spawning grounds for fish.

In addition to creating such problems, poorly planned and unregulated transportation systems will result in needless duplication of systems, extra costs of construction, unduly high maintenance costs, and other wasteful practices.

Today, the Bureau's timber access development policy has pretty well met its goals of multiple-use, access, fostering competition, and helping ensure fair market value, while the Bureau's mineral access development policy has not yet been formulated.

II. Past Leasing Data

A. Analysis of Past Leasing Data

As set forth in WO Instruction Memo 79-219, all competitive coal leases from the period 1960-1978 were reviewed by the study team in cooperation with each state office. Because the Geological Survey Coal Bidders List goes back to 1965, only those leases from 1965-1974 were statistically analyzed. Leases newer than 1974 were not used in the analysis because they were all emergency leases in which there was a bidder in a superior position, so no competition really existed. Information for the analysis was gained from the following sources:

1. BLM's Automated Coal Lease Data System.
2. Geological Survey's Coal Bidder Listing.
3. Geological Survey's Coal Production Record.
4. Review of each State Office Coal Lease File.
5. Interviews with BLM and GS Personnel.

A total of 70 coal leases from six states were reviewed to determine if there was any statistical information that would indicate whether legal access to a lease area did or did not attract a greater number of bidders and also produce higher bids.

Data From All States:

The number of leases by state are broken down as follows:

	1965-1974
Wyoming	28 Leases
Utah	15 Leases
Colorado	10 Leases
Montana & North Dakota	12 Leases
New Mexico & Oklahoma	5 Leases
Total	70 Leases

1. The size of leased areas ranged from 40 acres to 20,700 acres with the majority of the larger leases occurrring in Wyoming. Average size of the 70 leases is approximately 2,900 acres. (See Illustration 1 for a histagram of the distribution by size).

2. The average coal reserves on these leases is approximately 41,250 tons per acre.

3. When the adjusted* average price bid per acre was compared on leased tracts having apparent legal access as opposed to those having no legal access, the following was found:

Price Bid Per Acre:

Without Access -- 24 Tracts -- $36.04 Per Acre

With Legal Access -- 46 Tracts -- $55.58 Per Acre

* Bid prices were adjusted to 1976 base to remove the time variable.

4. A comparison of the number of bidders that were attracted to lease sales with legal access and without legal access shows a 2.5 percent increase in number of bidders for leases with access.

Average Number of Bidders:

Without Legal Access -- 51 Bidders -- 24 Tracts = 2.125 Bidders/Tract

With Legal Access -- 100 Bidders -- 46 Tracts = 2.174 Bidders/Tract

(See Illustration 2 for a distribution of number of bidders per lease).

5. A second degree polynomial regression of the number of bidders and the adjusted price paid per acre revealed a significant 69.3 percent correlation. (See Illustration 3).

   If legal access to a coal lease area will attract more bidders, then there is an apparent corresponding benefit of receiving higher bids. (See Illustration 3).

There are many variables that could collectively influence the question of whether guaranteeing access to Federal coal leases will foster competition and help ensure a fair return to the public: date of sale, size of lease area, quality of coal, amount of coal, adjacent ownership, adjacent lease holder if any, strippable coal or underground mining, etc. Many of these variables were looked at independently as to their significance to the number of bidders and the price paid for the leases that had legal access and those that did not. Individually, many of the variables had coefficients of determination (R^2) that were not significant, but collectively these items could influence how a company would bid.

Some of the variables that were compared through regression analysis and their statistical relationships for all 70 leases are shown below:

	VARIABLES COMPARED	CORRELATION COEFFICIENT (cc)	COEFFICIENT OF DETERMINATION (R^2)
1.	Adjusted Price Per Acre Bid* to Number of Bidders	0.69320	0.48052
2.	Number of Bidders to Amount of Coal Reserves 1000 Tons Per Acre	0.40299	0.16240
3.	Number of Bidders to Access in Lease	0.29036	0.08431
4.	Adjusted Price Per Acre Bid* to Amount of Coal Reserves 1000 Tons Per Acre	0.21703	0.04710
5.	Adjusted Price Per Acre Bid* to Acres in Lease	0.13975	0.01953

Only the adjusted price per acre bid compared to the number of bidders was found to be statistically significant.

* Bid prices were adjusted to 1976 base to remove the time variable.

Data From Wyoming:

A separate analysis was made of the 28 Wyoming competitive coal leases from the period of 1965-1974. Wyoming is the most active coal mining area. It is likely that most of the leases in the near future will be in Wyoming.

Some figures to note for Wyoming are as follows:

Average Adjusted Price Paid Per Acre:

Leases Without Legal Access -- 9 Leases -- $ 58.04 Per Acre

Leases With Legal Access --19 Leases -- $114.21 Per Acre

Average Number of Bidders Bidding on Sales:

Leases Without Legal Access -- 9 Leases -- 2.55 Per Lease

Leases With Legal Access --19 Leases -- 3.263 Per Lease

A regression of the number of bidders compared to the adjusted price of the high bid for Wyoming produced a significant R^2 value of 0.49966. The relationship is shown on Illustration 4.

The average lease size is approximately 4,700 acres with the number by size distribution shown on Illustration 5. Note that the majority of the larger leases are found in Wyoming.

The average coal reserves on the 28 Wyoming leases is approximately 64,500 tons per acre.

A variable that was not reviewed or analyzed in Wyoming or in the other states was the possibility of a bidder being in a superior position. The fact that a bidder is an adjacent landowner and/or lease holder could be the largest influence on the number of bidders that participate in a sale and the amount bid. On leases with legal access, the bidder in a superior position would have less of an advantage but still possesses a smaller move-in and start-up advantage over his competition.

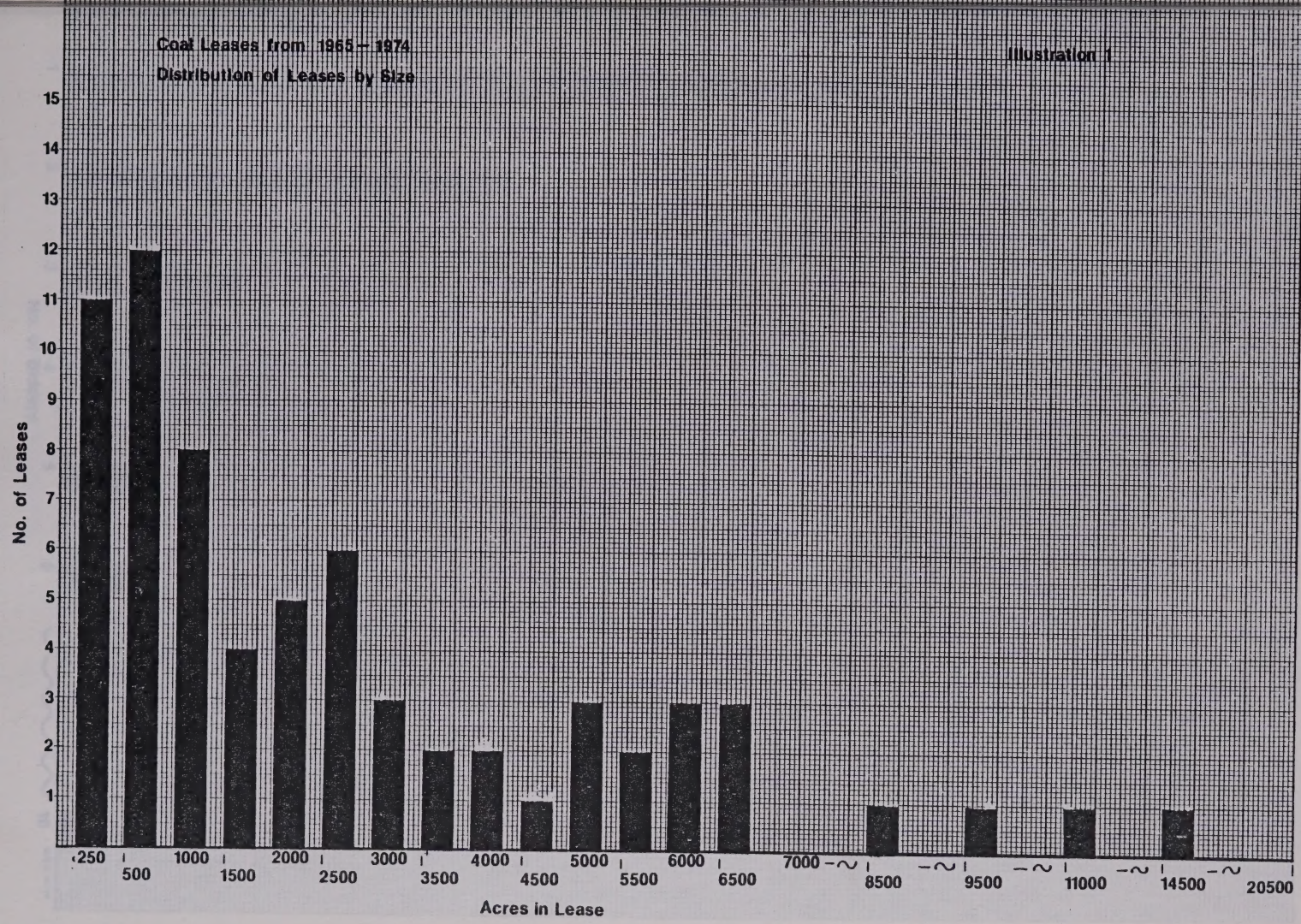
If the average cost of access to a coal lease is approximately $30,000 and the average lease size is about 2,900 acres, then the BLM will need an increase bid of approximately $10.50 to defray the cost of easement acquisition. The past leases indicate an increased bid of nearly double the estimated $10.50 needed.

Many of the future leases will likely be in Wyoming, and a look at the figures from Wyoming indicates an even greater increase in bid on leases with legal access and a much larger average lease size.

This coal lease analysis points to a parallel with the experience in BLM's timber program and the interviews with the coal mining executives found elsewhere in this report.

B. Illustrations

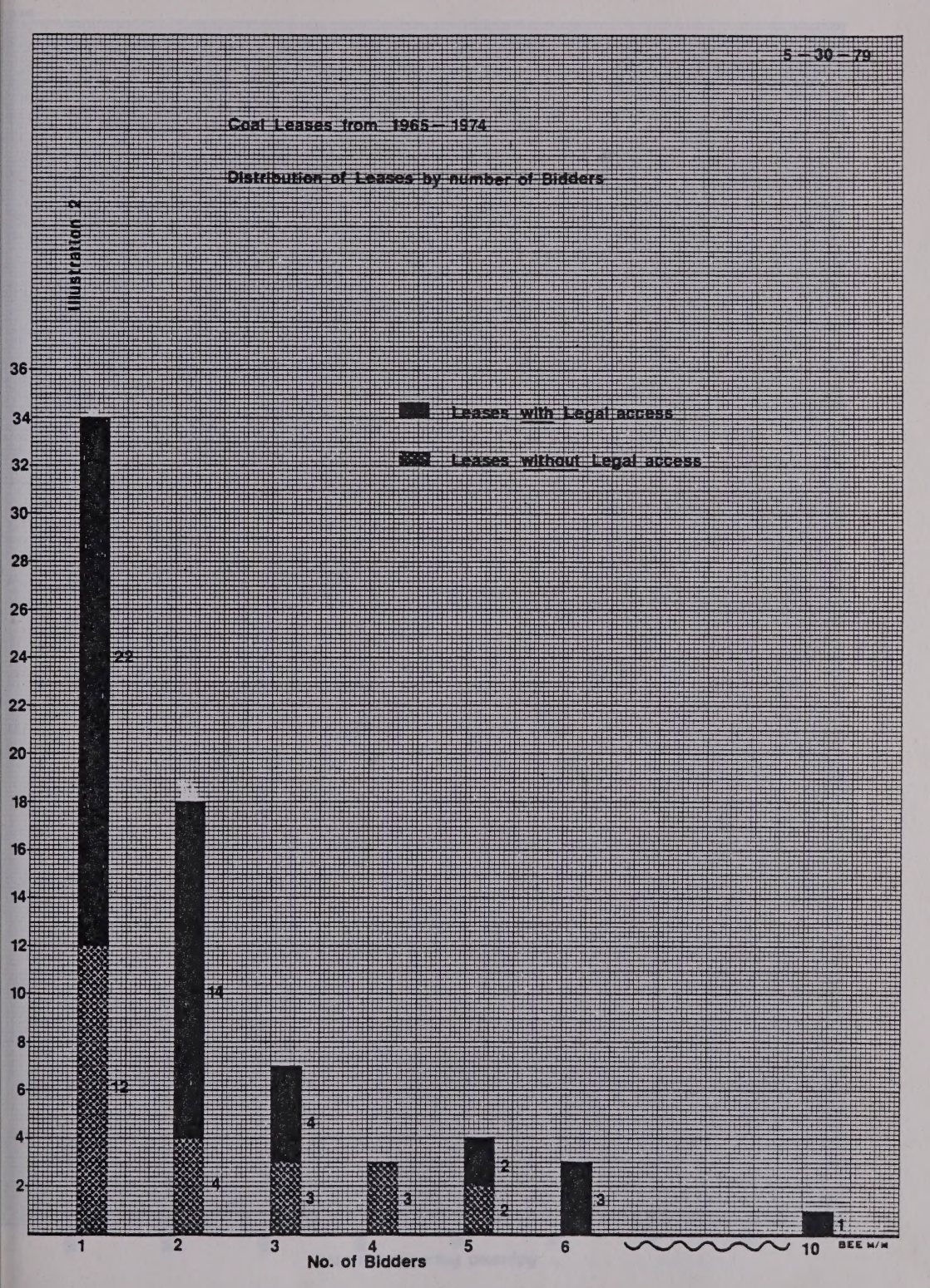
The following charts and graphs illustrate the information discussed in this section.


Coal Leases from 1965 – 1974
Distribution of Leases by Size
Illustration 1
No. of Leases
15
14
13
12
11
10
9
8
7
6
5
4
3
2
1
250
500
1000
1500
2000
2500
3000
3500
4000
4500
5000
5500
6000
6500
7000 – 2
8500
– 2
9500
– 2
11000
– 2
14500
– 2
20500
Acres in Lease

Coal Leases from 1965 – 1974

Distribution of Leases by number of Bidders

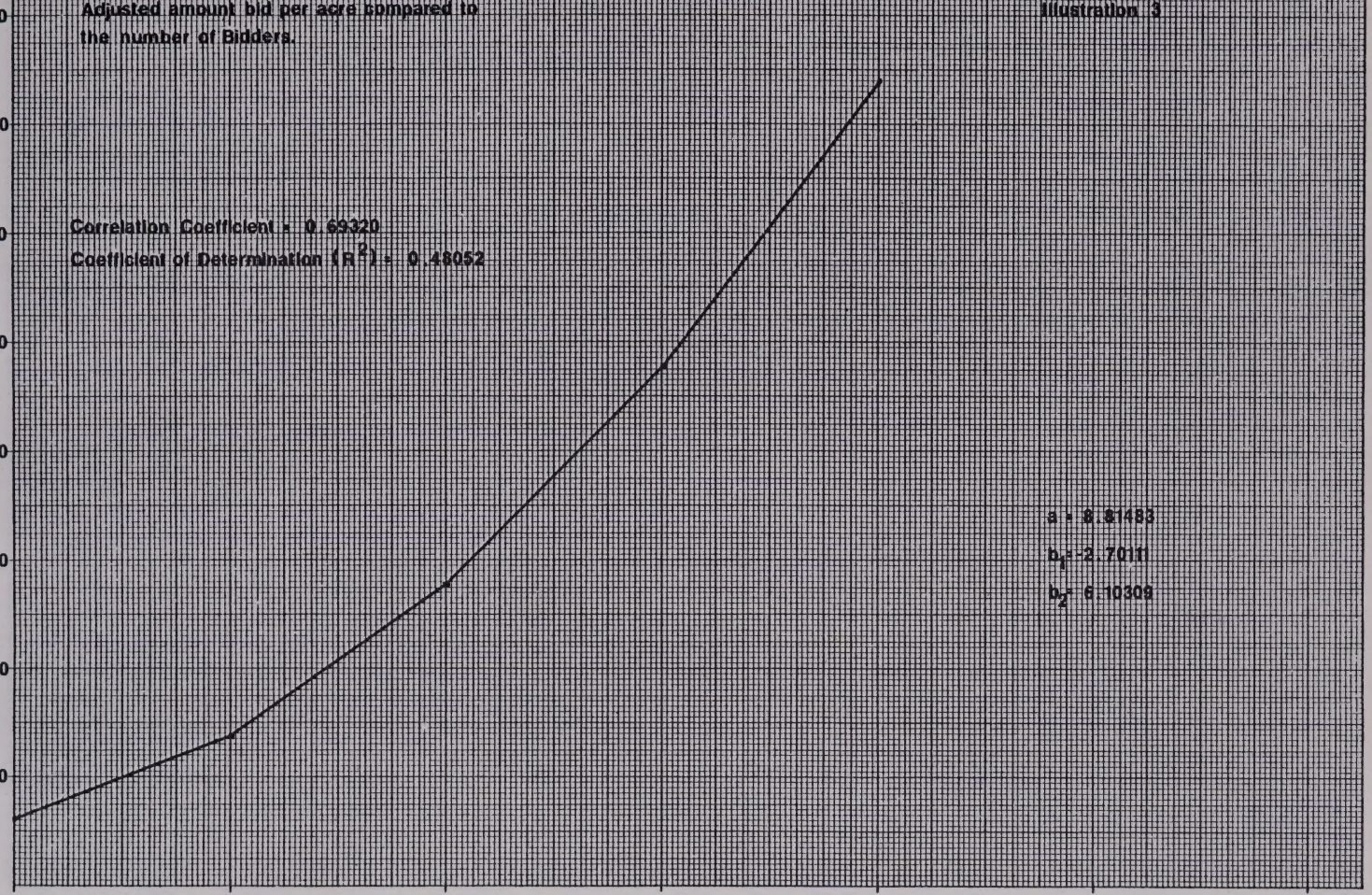
Illustration 2

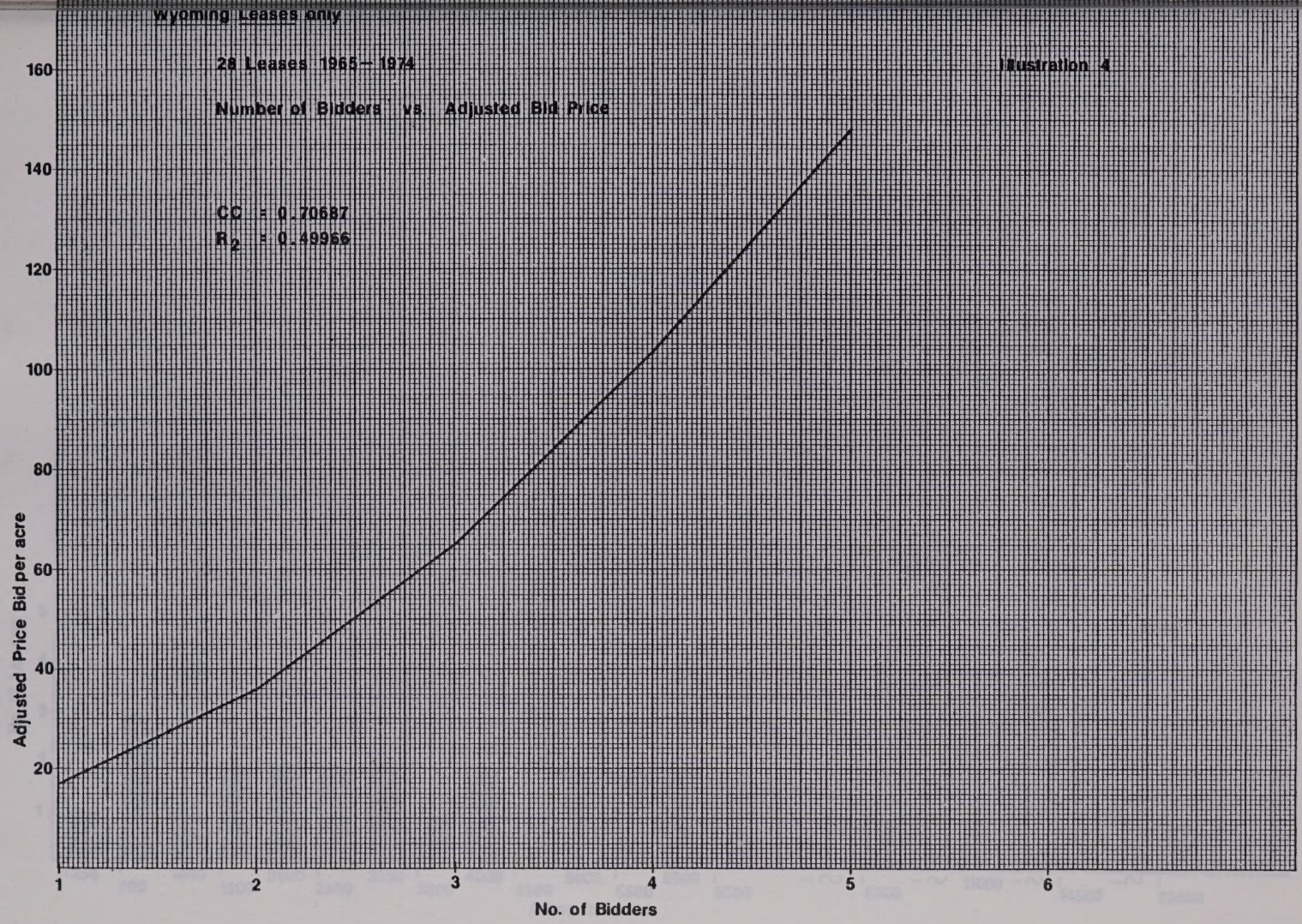


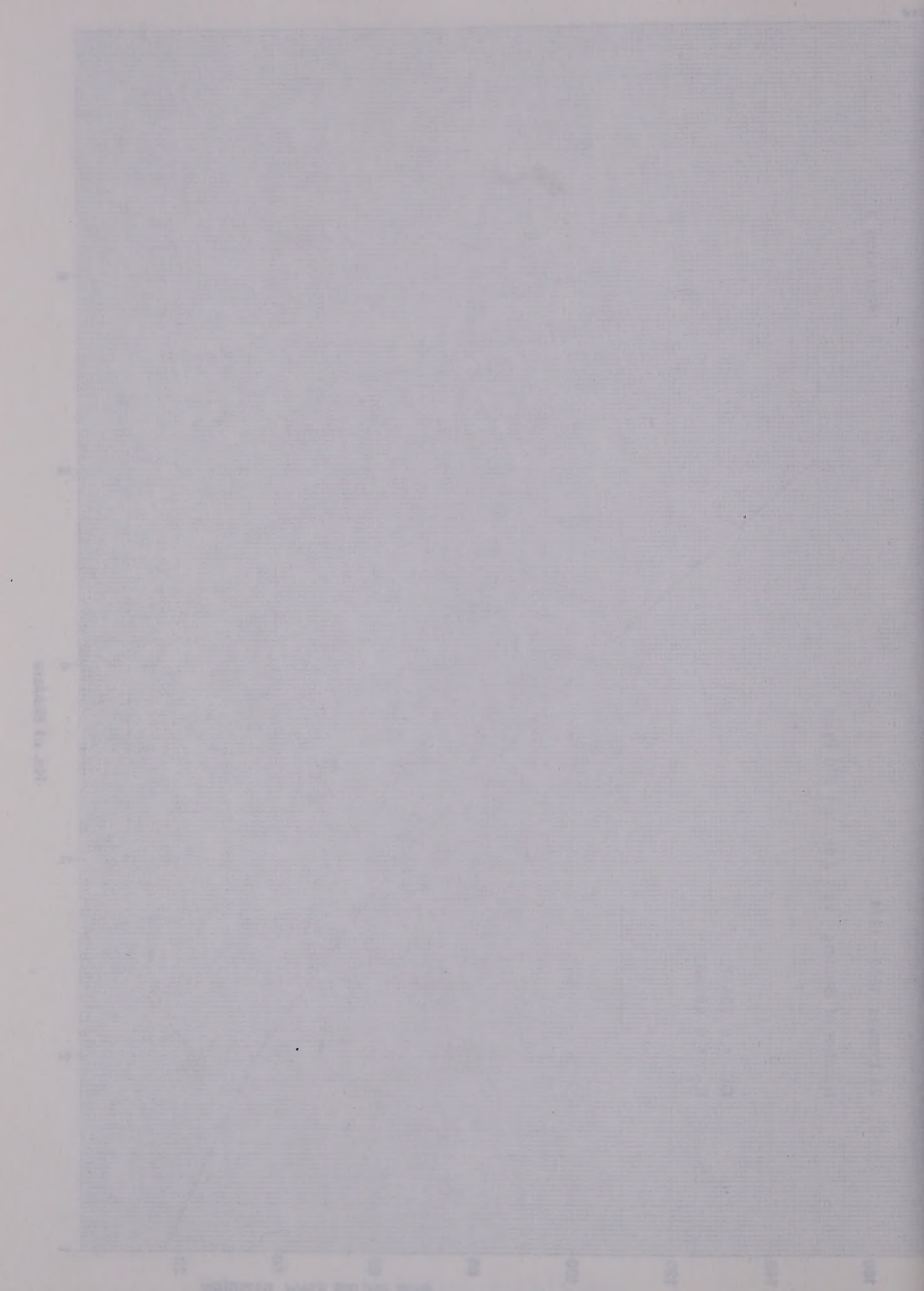
All Coal Leases 1965 – 1974

Adjusted amount bid per acre compared to the number of Bidders.

Illustration 3

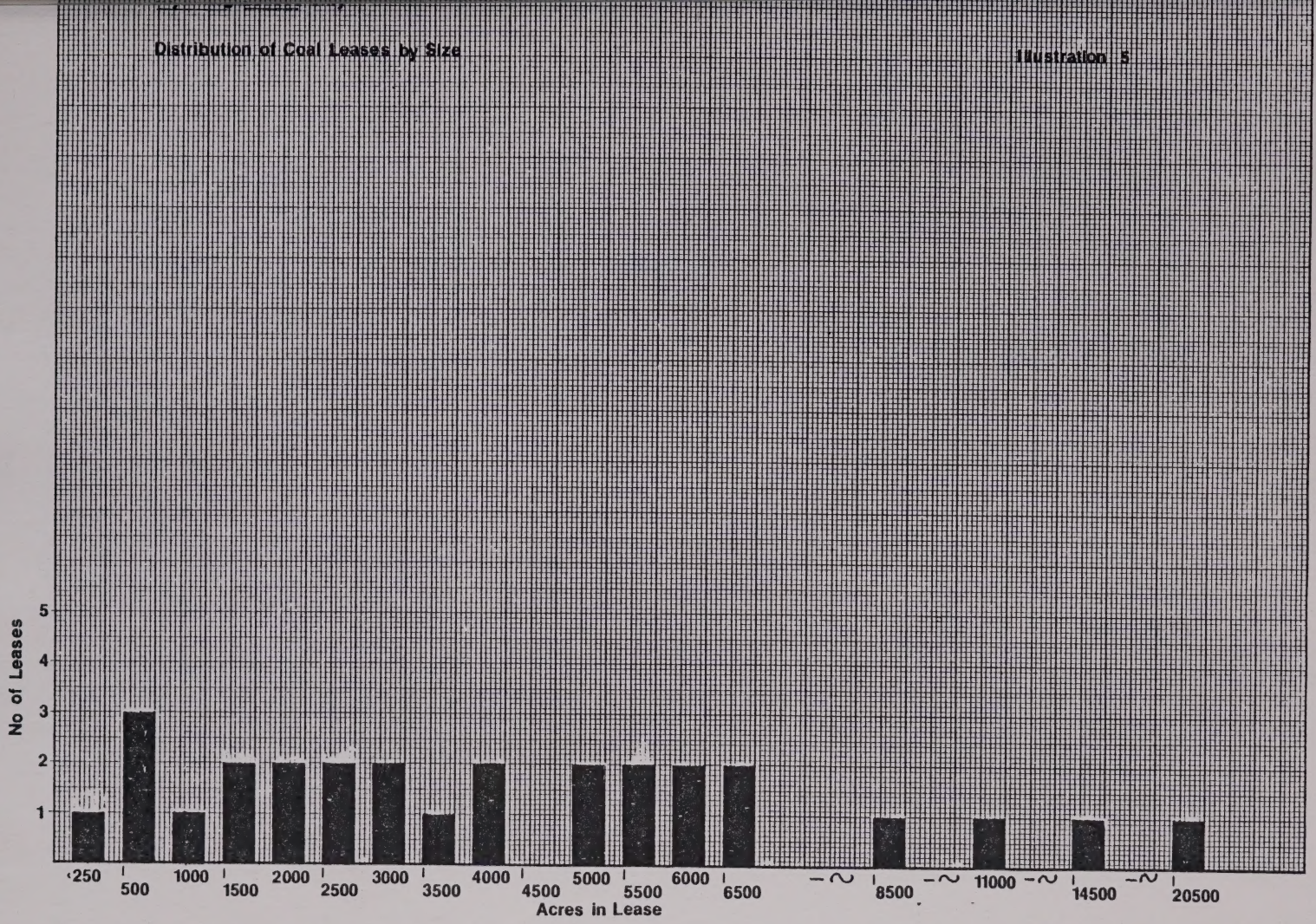



Wyoming Leases only
28 Leases 1965 – 1974
Illustration 4
Number of Bidders vs. Adjusted Bid Price
CC = 0.70687
R_2 = 0.49966
Adjusted Price Bid per acre
160
140
120
100
80
60
40
20
1
2
3
4
5
6
No. of Bidders



Distribution of Coal Leases by Size

Illustration 5



III. Interview Information

Interviews were conducted with the following:

Corporations

Consolidation Coal Company, Inc., Denver, Colorado

W.R. Grace Coal Company, Denver, Colorado

Atlantic Richfield Company, Denver, Colorado

Energy Fuels, Denver, Colorado

Carter Mining Company, Gillette, Wyoming

Amax Coal Company, Gillette, Wyoming

Western Energy Company, Billings, Montana

Montco, Billings, Montana

Wesco Resources, Billings, Montana

Western Coal Company, Albuquerque, New Mexico

Plateau Mining Company, Price, Utah

Associations

Utah Coal Operators Association, Salt Lake City, Utah

American Mining Congress, Washington, D.C.

National Coal Association, Washington, D.C.

Western Interstate Energy Board, Denver, Colorado

State Governments

Department of Natural Resources, State of Colorado

Land Commissioner, State of Colorado

State Governments (Continued)

Division of State Lands, State of Utah

Coordinator of Mined Lands, State of Utah

Director of Mineral Division, State of New Mexico

Federal Agencies

BLM State Directors and Staffs in Colorado, New Mexico, Utah, Wyoming, and Montana

Area Mining Supervisor, USGS, Albuquerque, New Mexico

Office of the Solicitor, US DOI, Washington D.C. and Denver, CO

USGS, Denver, Colorado

Bureau of Mines, Denver, CO

Interviews were conducted with BLM State Directors and Staffs, other Federal Agencies, State Governments and coal industry representatives to solicit their thoughts on past leasing access problems and suggestions for future policy on access. The interviews lasted from 1-2 hours and many coal leasing problems were discussed. So that some continuity could be maintained between interviews, the standard four-questions as set forth in the interview letter were addressed. The information gathered is discussed and summarized as follows:

A. BLM State Directors and Staffs

Comments by State Directors ranged from: "The existing coal leasing system is working satisfactorily so do not change the present access policy," to "There is a need to look at the present access policy for coal leasing to see if a guaranteed access policy would help." As a general statement, it would seem that most State Directors take a very guarded position because of the uncertainties of a new policy. They raised questions such as: "Can BLM really produce the needed access?" "How much lapse time will there be?" "Do we have the funds or manpower to do the work?" One State Director felt that if flexibility were built into the policy, then a guaranteed access policy could work.

Most State Office staffs (Resources and Technical Services) were concerned about the mechanics of such a policy and how it would be implemented.

B. Other Federal Agencies

People interviewed in the Bureau of Mines and Geological Survey could cite no cases where access affected bidding, even though they were aware that the private surface around Federal leases is usually purchased by a company prior to the company asking that the lease be sold.

C. State Government Representatives

The thought of guaranteed access to coal leases was a new concept to most State resource agencies. They had a difficult time grasping the concept since they really never thought of access being a problem. One State representative felt that a Federal policy of guaranteeing access to coal leases may require the state to adopt such a policy. Because of the newness of the concept, most State representatives could express a view in favor of, or against, a Federal policy of guaranteed access. Most generally agreed that their charter was to earn the greatest revenue from State lands and if the Federal policy of guaranteed access proved to increase revenues, they would more than likely follow suit.

D. Coal Industry Representatives

The 15 coal industry representatives interviewed expressed comments such as "Access has never been a problem," "Access to the Federal leases has been one of many problems confronting us," and "Guaranteed access would definitely help." As a general comment, it appears that those companies in the business of buying privately owned surface over or adjacent to coal felt that guaranteed access to Federal coal leases would not foster competition or help ensure fair market

value for the resource. Those companies in the business of mining coal and not in large scale surface acquisition programs favored a guaranteed access program. One exception was that probably the largest purchasers of surface rights was very favorable toward a guaranteed access program by the Federal government.

E. Summary of Interview Comments

The summary below quantifies responses from those interviewed to the four basic questions:

QUESTIONS	RESPONSE
1. How do companies presently gain access to Federal coal leases?	Without exception all companies and industry associations said they lease purchase the surrounding surface. In a few instances, the companies purchased a right-of-way for a specific road. Most counties cooperate in constructing, or taking

QUESTIONS	RESPONSE
	over after construction, those roads necessary for coal development. When new railroads are needed for transportation of coal, the railroad companies acquire needed rights-of-ways. The same for utility rights-of-way, i.e., the appropriate utility will aquire the needed rights to furnish power, water, etc.
	Coal companies in Wyoming and Colorado have the right of eminent domain but have never used it. Railroads in all five of the Western coal states have the right of eminent domain, but again seldom has it been used.

QUESTION	RESPONSE
2. Do you have any information or estimate of what acquisition costs to a coal lease would be?	There was very little quantifiable response since most companies acquire access to lease areas when they lease purchase the surface rights over and adjacent to the Federal coal. Most lease purchases pay a minimum of "front-end money." The companies prefer to pay a royalty per ton when coal is mined. When rights-of-way have been purchased, the companies have noted many instances of "hold-up" prices being paid. The companies said that while such prices are high, they usually will

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2. Do you have any information or estimate of what acquisition costs to a coal lease would be?	There was very little quantifiable response since most companies acquire access to lease areas when they lease purchase the surface rights over and adjacent to the Federal coal. Most lease purchases pay a minimum of "front-end money." The companies prefer to pay a royalty per ton when coal is mined. When rights-of-way have been purchased, the companies have noted many instances of "hold-up" prices being paid. The companies said that while such prices are high, they usually will

QUESTION	RESPONSE
	negotiate the best deal possible and pay the price, since it is important to keep harmonious public relations and keep the operation going. Generally companies feel the cost of access is minimal compared to total development costs.
3. Do you feel that higher bids would be received if the Federal Government quaranteed access to the lease area?	Of the 25 interviews, the responses were as follows:

	yes	no	no response/ uncertain
Coal Corporations	8	1	2
Coal Industry Reps.	1	-	3
State Gov't Reps.	5	-	-
BLM State Directors	2	3	-
Total	16	4	5

QUESTION	RESPONSE

4. Would individual companies bid on more coal leases if the Federal Government guaranteed access to the lease area?

Of the 25 interviews, the responses were as follows:

	yes	no	no response/ uncertain
Coal Corporations	7	2	2
Coal Industry Reps.	1	-	3
State Gov't Reps.	5	-	-
BLM State Directors	2	3	-
Total	15	5	5

IV. Cost of Guaranteeing Access

A. Present Company Costs

Most companies were reluctant to quote exact costs of acquisition for gaining access to coal leases. They would discuss a range of costs, and most agreed that the cost of such acquisition is minor compared to overall development costs for coal. Costs will vary by state and the type of right acquired. Companies generally felt they could acquire access rights more expeditiously, but surprising as it may seem, more than half felt the government could acquire at less expense. This is because the government would have less flexibility in appraisal and negotiating practices. Federal rules are well set by the courts and by statute (P.L. 91-646) for Federal land acquisition practices. The companies, on the other hand, will let immediate need and costs of alternative access to the coal set a limit for cost. If they need access to the coal to keep operating, they will generally pay the surface owner what he wants. Several instances of "hold-up" prices were mentioned in interviews with company and State government representatives. A general set of costs for access to coal leases as related by companies is:

BLM Library
Denver Federal Center
Bldg. 85, OC-521
P.O. Box 25047
Denver, CO 80225

BLM Library
Denver Federal Center
Bldg. 85, OC-521
P.O. Box 25047
Denver, CO 80225

$1000 per acre for railroad right-of-way in fee

$1000 per acre for plant sites

$900 per acre for road rights-of-way

$1000 - $6000 per acre for purchase of surface rights

B. Present BLM Costs

There has been an active Bureau easement acquisition program for public land management and development in western Oregon for 25 years and Bureau-wide for 10 years. The scattered and checkerboard ownership pattern of public and private lands in the Western States requires such a program. Total expenditures and negotiation success for the period FY 1972 - FY 1978 is shown below:

BLM'S ACQUISITION PROGRAM

	FUNDS EXPENDED	NO. OF TRACTS ACQUIRED	NEGOTIATED TRACTS	CONDEMNATIONS
FY 1972	$263,000	167	160 (96%)	7 (4%)
FY 1973	$953,690	139	133 (96%)	6 (4%)
FY 1974	$256,501	181	178 (98%)	3 (2%)
FY 1975	$557,402	125	120 (96%)	5 (4%)
FY 1976	$1,330,794	181	179 (99%)	2 (1%)
FY 1977	$1,812,477	153	151 (99%)	2 (1%)
FY 1978	$1,296,994	182	176 (97%)	6 (3%)

BLM ACQUISITIONS FOR PERIOD FY '72-'78
IN THE WESTERN COAL STATES

	No. of Easements Acquired	Dollars Paid	Dollars Paid Per Easement
Colorado	30	$ 74,289	$ 2,476
Montana	82	68,174	8,314
New Mexico	13	77,221	5,940
Utah	7	14,240	2,034
Wyoming	135	135,378	1,003
TOTALS	267	$ 369,302	$ 1,383

Average Cost Per Acre

From past BLM easement acquisitions, the estimated average easement is one mile long.

An easement 100' wide 1 mile long = 12.12 Acres $1383 ÷ 12.12 Acres = $114 Per Acre

C. Cost of Guaranteed Access to Coal Leases

Since one of the critical concerns in the guaranteeing of access would be the cost of the program and whether such costs would outweigh the benefits derived, it is important that an estimate of costs of such a program be derived. To ascertain such costs, it is necessary to make certain assumptions as to an average coal lease. The following table estimates the costs of acquiring access to such a lease:

ESTIMATED COST OF ACQUIRING ACCESS TO A COAL LEASE TRACT

AVERAGE LEASE ASSUMPTIONS

3 miles Right-of-Way needed
2 acquisitions/lease
$300/acre land value

TYPE OF R/W COST	LAND (Based on $300/acre)	WM* / LEASE (Based on 6 WM)	PER LEASE
Road (100')	$ 10,800	$ 12,000	$ 22,800
Railroad (200')	21,600	12,000	33,600
Transmission Line (100')	10,800	12,000	22,800
Pipeline (50')	5,400	12,000	17,400

*1 Work Month (WM)/acquisition
1 WM for survey & design/mile
1 WM appraisal

If access to coal were acquired prior to a coal lease, the easement acquired would provide for general rights-of-way purposes; thus, if feasible, a truck haul road, a railroad spur, or utility lines could be placed on the right-of-way area. A separate easement would not have to be purchased for each purpose, but rather there could be multiple use of each right-of-way. Through the BLM planning system, this right-of-way would be placed in a location that would serve not only the coal resource but also would benefit the management of all the resources in the area.

If it is assumed that cost of access acquisition to a coal lease is $30,000 and an average lease size is 3,000 acres, the government would have to receive an increase of $10.00 per acre in the bonus bid to recapture the costs.

Concerns have already been raised by BLM resource managers over the increasing costs of acquiring access to public lands because of the high price which energy development companies have paid to landowners holding key access to public coal and other energy sources. It is not uncommon for oil and gas companies to pay thousands of dollars to landowners for temporary access for exploration. Yet, when BLM needs perpetual access across those same landowners' properties to reach public lands, it can only offer less than half that amount based on a fair market value appraisal of the rights acquired.

V. Alternatives

A. Retain Present "Caveat Emptor" Policy

It is feasible to continue leasing coal under the present policy of caveat emptor (let the buyer beware) - there is no guarantee of access to the coal lease area. It is up to the successful bidder to be fully aware before the coal lease sale of access conditions. A prospective bidder must know who owns the non-Federal surface over or surrounding the Federal coal and what will it cost to use that surface. In most cases in the past, the private surface has been acquired before a tract was requested for Federal lease. Thus, when the tract was offered for bid, the controller of the surrounding surface invariably would get the Federal coal.

B. Guarantee Access to Future Competitive Coal Leases

1. Identify and Acquire Access Prior to Leasing Federal Coal

In order to have a managed transportation system that is suitable for all the different resource needs in an area, the locations of mainline roads would be located not only for access to the coal lease area, but for all resources. This would eliminate the possibilities of duplicate road systems.

As the BLM planning system identifies public lands suitable for coal leasing and consistent with multiple-use resource management, access to reach that coal should be considered at Step 3 MFP and

when activity plans are developed for a planning unit. At this point, the land managers should be considering not only whether access should be acquired, but also what type of access. Access to the Federal coal can be acquired prior to the coal lease and guaranteed by two methods -- easements or right-of-way agreements.

Easements may be purchased across private land to provide access to the proposed lease area. They can be acquired with the use of appropriated funds and under the authority of the Secretary of the Interior in the Federal Land Policy and Management Act of 1976 (FLPMA) Section 205. Public lands in FLPMA are defined as "lands or interests in lands under the administration of the Secretary of the Interior." Thus, access can be acquired to those Federal lands owned in fee (surface and subsurface) and those "split estates" (private surface and Federal coal). BLM's standard easement forms for roads are 2130-3 and 2130-4. The General Easement Form 2130-6 can be used to secure a right-of-way for a road and/or for other purposes, i.e., railroad, pipeline, or transmission line.

Even though the means for acquiring access are available, one of the problems of acquiring access ahead of the lease is the inability of the land manager to determine how the coal resource would be developed and transported to a utilization point. If five companies would bid on a coal lease, each would probably submit a different mining plan, and each would probably be serving a different market.

Thus, it could be difficult or even counter-productive to acquire an access route by easement to the coal ahead of the lease sale.

Other than easements, access to coal leases may be acquired through the use of cooperative right-of-way agreements with large surface owners. This would be particularly applicable in railroad checkerboard ownership and in areas where companies have purchased most of the surface over or around Federal coal. Examples of these areas would be Union Pacific lands in southern Wyoming and areas in Montana and North Dakota where much of the private surface has been purchased over and adjacent to Federal coal subsurface estates. Entering into such agreements with companies would be dependent upon Secretarial policy to require reciprocity of access across private lands as a condition for granting access across Federal lands to reach private coal. This policy was adopted by the Secretary of the Interior for timber and timber landowners in the Western United States over 25 years ago and has resulted in some 900 reciprocal rights-of-way agreements and permits being negotiated. These agreements have formed the "backbone" of the Bureau's timber access road development in western Oregon. The advantage of this form of right-of-way acquisition is that the United States can guarantee access to all potential lease bidders. Even though final approval of route and standards for access are dependent on final location, all conditions for crossing the private land to get to Federal land are known. Thus, the bidders can allow for these

conditions when bidding. Another advantage of cooperative right-of-way agreements is that they will allow public-private and joint-financing of roads to serve the Federal and private lands.

Persons desiring to bid on Federal coal leases would be required to make available to other bidders, at a fair price, any access rights held by them. This would be similar to the practice promulgated pursuant to the Surface Mining Control and Reclamation Act of 1977, concerning the necessity of obtaining surface owners' consent before government subsurface coal is to be offered for leasing. The regulations state that such consent will be obtained by prospective lessees prior to tracts being offered for lease, and these rights are to be assignable.

2. Federal Support of Private Acquisition of Access to Federal Coal Leases

The Department of Interior may guarantee access to the coal lease for any prospective bidders merely by using the Secretary of the Interior's authority as a "court of last resort." The Secretary of the Interior could adopt a policy similar to the Secretary of Transportation under 23 USC 101(a), 107, 210(e), and 23 CFR 712.504. This policy provides that if State Highway Departments are unable to acquire necessary access rights for the Interstate Highway System, National Defense System, or Defense Access Roads, they can request the Secretary of Transportation to use his authority to acquire such rights.

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To guarantee access rights to coal leases, the Secretary of the Interior could, by policy, provide assurance to all prospective bidders that if they could not acquire access necessary to carry out an approved mining plan the Secretary would acquire such rights upon the lease holder's request. This option would only be exercised by the Secretary in those cases where state statutes would not provide eminent domain rights to coal companies. The States of Wyoming and Colorado allow coal companies the right of eminent domain for railroad spurs, tramroads, and other rights-of-ways. Montana, Utah, and New Mexico have no such statutory provision for coal companies, although generally railroads have such rights of eminent domain in those respective states.

The Department of Interior could support private acquisition of access to coal leases by reimbursing companies for the cost of acquisition. Such a program would require guidelines for acquisition, again comparable to the Department of Transportation in financing States, acquisition funds for the Federal Highway System. Reimbursement of acquisition costs to private companies may be justified if the Government receives high bids for the coal. If the cost of acquiring access by private companies is greater than for the Government to acquire the access, as is indicated by this study, this procedure could be very expensive.

C. Develop Flexible Policy of Future Competitive Leases.

The variety of land ownership patterns in the Western United States, the different state statutes regarding coal access, and the varying needs for transportation to serve each coal lease may require a flexible policy of guaranteed access to Federal coal leases. A flexible access policy would allow the authorized officer (BLM District Manager) to determine what method of guaranteeing access is most suitable for a particular situation. An undeveloped block of public land in which transportation systems need to be planned for the benefit of all the resources may require total planning and acquisition of the access route before the coal is leased. An area of checkerboarded ownership may be suitable for entering into a reciprocal right-of-way agreement with the private surface owner. Isolated tracts of public lands or areas of "split estates" may be best served by letting the successful bidder acquire the necessary rights. The Department of Interior would only acquire access if the company could not and they request the Department of Interior to do so.

Realistically, there are situations in which no access would be guaranteed. Situations such as by-pass coal and hardship cases are not true competitive coal leases and should not be considered as such. Under a flexible policy of guaranteed access to coal leases, situations of not guaranteeing access should be the exception and not the rule.

VI. Findings and Conclusions

These findings and conclusions are based on 1) an analysis of past coal leasing information, 2) a prediction of future coal leasing practices, and 3) information gained from over 24 interviews with a cross-section of coal companies, coal company representative groups, BLM State Directors, other Federal agencies, and State Government representatives. The entire study was directed toward answering or at least "shedding light upon" these questions.

Findings

QUESTION 1: Has access to federal coal leases been a problem?

ANSWER: Most of those interviewed have not recognized access as a major problem. BLM's coal leasing program has been largely reactionary to coal company requests for leases. The coal companies' common practice has been to request to lease (nominate) a Federal tract of coal after they have already acquired the surface around it. As one large coal company said, "We have never had an access problem of getting to Federal coal, because we purchase everything around it before we nominate the tract for lease." The past leasing records show that there has never been a federally nominated lease tract. All 533 leases from 1960 to 1978 and even those 161 so-called competitive leases were leased after a company requested the lease.

VI. Findings and Conclusions

The cost of acquiring access to a Federal coal lease has not been of concern. Compared to the total coal production costs, the cost of access to get to the lease is nominal. This is true even though some instances of paying "hold-up" prices were noted. One company related how they bought a BLM lease in early 1970 and have not been able to get to it since then because another company purchased the surrounding surface. Several companies noted that although access is a nominal cost, it is time consuming. They felt that if the government acquired the rights-of-way to the coal lease, it would be one less burden for them. Generally, the counties have been very cooperative in assisting coal companies in truck haul road rights-of-way. The counties in all five western coal states have generally assumed the responsibility of maintaining such roads as county roads once they are constructed and meet county standards. When railroad spurs, power, and other utilities are needed, the appropriate utility company acquires the right-of-way and fulfills the request.

While access has not been an insurmountable problem to coal companies in the past, the future may be different.

Under the preferred leasing program, the United States will be selecting tracts for competitive leases after input by industry and land managers. Department of Energy by its charter and Department of Interior by its policy are committed to fostering competition. By its very nature, a competitive lease would be one which is available for any qualified candidate to bid. The surrounding private surface owner, even though he may have a competitive advantage, should not be able to preclude others from bidding because he controls legal rights to get to the Federal resource. If that situation should occur, then it would seem that the public resource managers would have an obligation to make the Federal resource competitive by acquiring access rights from the owner.

The company practice of buying surface estates over and around coal has declined since 1975. One reason is that most of the surface rights, as high as 90 percent in some areas, have been purchased or leased by major companies in the business of coal exploration or development. Most companies interviewed would not object to the United States acquiring access rights although they raised the question of the Government's capability and whether the cost would be worth it. One of the largest private owners of surface rights

said, "A Federal policy of guaranteed access would be just and we would be willing to take the good with the bad. We recognize it would be a two-edged sword. We would benefit in some areas and give up rights in others."

In one month's time in 1979, the Bureau of Land Management has had to answer eleven congressional inquiries that were dealing with the problem of access. Access to Federal oil and gas leases, coal leases, general management, and access for the public to get to the public land is becoming more of a problem each year. As the population increases, there is more and more demand for the resources on the public lands, not only for commercial uses, but for all uses. Access to the public lands is an absolute necessity for the management and use of the resources.

QUESTION 2: How much does it cost companies to gain access to Federal leases and would it be beneficial for the Federal Government to guarantee access to coal leases?

ANSWER: Normally, companies have purchased the surface rights across adjacent owners for access, exploring, and possible mining. The direct cost of access is thus

difficult to determine, since the cost of the agreement is based on acres of surface and quantity of coal removed. Where companies have purchased rights-of-way, costs are about $1,000 per acre. BLM records show that the Government is paying about $100 per acre for road access to public lands for multiple resource management. Companies readily admit that they will pay a premium price to avoid litigation and lengthy negotiations. That price is then passed to the consumer as energy development costs. Because of their ability to negotiate price, companies can often acquire access rights more expeditiously. Time to acquire was a concern of many BLM managers.

Any program to acquire access to coal leases would have to be on a sequential basis so that needs would be recognized 2 to 3 years prior to the proposed coal lease sale. Much of the acquisition work would be done simultaneously with the planning work and identification of tracts for lease. Once the coal tracts are identified, acquisition of access would be completed on a scheduled basis and there would be no delay of coal leasing. The Bureau's timber sales are offered with guaranteed access, and the tracts are identified 2 to 3 years ahead of the

scheduled sale so that access can be acquired through easement purchase or through reciprocal road use agreements.

QUESTION 3: Would the government receive higher bids if there were guaranteed access to the lease area?

ANSWER: The response to this question by company and governmental representatives was a surprising high: 16 Yes, 4 No, and 5 Uncertain. A study of the past competitive lease records (1965 to 1974) shows that bids are generally higher when the lease tract had a public access route to the tract. The bid price for coal leases during that period with access was $55.58/acre and without access was $36.04/acre As a Geological Survey Mining Area Supervisor said, "We are aware of the need to be able to get to the lease area, and that is why we generally try to make the lease area large enough to have a legal access route (State Highway, county road, railhead, BLM road) into the lease tract."

QUESTION 4: Would companies bid on more Federal coal leases if they were guaranteed access to the lease?

ANSWER: Most companies stated that they would bid on more coal leases if they knew they had access to the coal tract. Of those companies asked to respond to the question of bidding on more leases, 15 said Yes, 5 No, and 5 Uncertain. Companies see guaranteed access as a way of expanding operations to new areas which are presently "locked-up" by large surface owners.

A study of the past competitive coal leases during the period 1965 to 1974 indicates that coal leases without access had 2.12 bidders per lease and coal leases with access had 2.17 bidders per lease. The trend indicates a 2.5 percent differential. A review of these same leases shows a significant correlation between number of bidders and bid price.

There is a direct correlation between number of bidders and bid price. (See Section II).

QUESTION 5: Would the cost to guarantee access outweigh the benefits derived?

ANSWER: Information gathered from coal representative interviews and from past BLM access acquisition records give insight into this question. It would indicate that the cost for guaranteed access would be economically beneficial. Guaranteeing access to the Federal coal tracts would increase the number of bidders and the bid price per tract. The bid price would have to increase about $10 per acre on a 3,000 acre tract to make guaranteeing access a positive cost-benefit ratio.

Of course, the cost of purchasing access with appropriated funds could be reimbursed by the successful bidder as a condition of the lease, or the Federal Government could consider that the increase in bid price compensates the public treasury. The latter seems preferable.

There is a public benefit from guaranteed access beyond the dollar and cent amount. That is the Federal resource manager's ability to plan transportation systems for total resource management

and to have the resources that use that system pay for it. Development of transportation systems can often be as environmentally damaging as the mining operation itself. It would be beneficial if the Bureau in its future coal leasing program could be able to help identify, plan, and finance those routes. Thus, they can be used to aid in the management of Federal lands and resource.

Conclusions

A Federal policy of guaranteed access to future coal leases prior to bidding could provide a benefit to the land managers, to the coal companies, and to the general public which is demanding sound and efficient management of its resources.

The most important thing about such a policy must be its flexibility. The policy must provide the resource manager with the means to provide guaranteed access depending on the particular situation.

SITUATION 1: A large block of undeveloped public surface estate.

The District Manager will determine, through the planning process, the transportation system necessary to provide multiple resource management of the total block. He will identify and acquire

legal rights to the access corridors, thus eliminating duplicate or environmentally degrading transportation routes to reach and to cross public lands. The legal rights may be acquired through the purchase of easements and/or the negotiation of right-of-way agreements with surface owners controlling access to the public lands.

SITUATION 2: Areas adjacent to existing coal lease tracts now being mined.

The District Manager may provide access through the use of cooperative right-of-way agreements as provided in Section 307 and for 502 of FLPMA. No rights to cross public land will be issued to a coal company for private development without the company granting reciprocal rights to the United States and its coal lessee.

Coal leases for hardship cases and by-pass coal should not be considered as competitive leases; thus they would be exempt from having guaranteed access for all bidders.

SITUATION 3: Area of split-estate where the Federal government owns the mineral estate only.

The District Manager may guarantee access to the lease area through negotiated right-of-way agreements and/or lending support to private acquisition of access and the Federal use of eminent domain if requested by the successful bidder or his/her assignee.

In all situations where a managed transportation system is needed for access to other resources and the protection of the environment, the location of roads would be subject to BLM's planning system and BLM approval as to location.

VII. Implementation

A policy of guaranteed access can be implemented within the Secretary of the Interior's existing authority through implementation of the following steps.

STEP I: Codify a policy of guaranteed access under Section 205 of FLPMA.

STEP II: Codify a policy of required reciprocity and cost-share agreements under Section 307 and/or 502 of FLPMA. It would allow cooperative public-private financing of transportation systems needed for development of all resources.

STEP III: Incorporate access to coal leases as a management decision in MFP and as a function to be programmed in the activity plan.

The intermingled nature of the private and public lands demands that their development be considered jointly to the fullest possible extent if reasonably prudent and efficient management is to take place. Certainly, it should be recognized that a surface transportation system for coal activities, no matter by whom or in what manner developed,

will have an effect on and possible utility to the management of all other resources found in an area. It will have an effect on an area under active mineral extraction, after extraction, and after any rehabilitation efforts have been completed. How well and efficiently such a system serves all the needs of an area will depend upon the management efforts put into its planning, construction, and administration.

The Bureau, in representing the United States, has the responsibility to assure that its administration of the sale of mineral resources is in harmony with requirements of other laws passed by the Congress. Among such are the realization of fair market value for the resource, a competitive place, protection of the environment, and proper management of other resources. Development of well planned transportation systems is one of the most important means to accomplish these aims. Assured access is a strong consideration in relation to proper planning of such integrated transportation systems.

Appendix I

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
WASHINGTON, D.C. 20240

DEC 6 1978

Memorandum

To: Team Leader, Ray Johnson, Denver Service Center

From: Assistant to the Director for Coal Management

Subject: Preparation Plan for Project - Access

As you know, you have been selected to lead the team effort for the above project. A sheet is attached defining this task and setting a final completion date. Your team members are Alexander Kennedy, Wyoming State Office; Don Mitchell, W.O., (140); and Ed Puchalla, W.O., (140) This participation has been approved by their respective supervisors.

Please prepare as soon as possible and submit no later than December 15, 1978, to the Director (140) a plan of preparation for this project. This plan is to be specific and establish interim work products and deadlines as necessary. You are to work with your team members in completing your plan of preparation.

Your plan will be given priority attention for review and approval so you can proceed with this task. Call either Tom Walker or Don Mitchell (extension 4537) on any questions.

Mont E. Jordan

#1. Access

Description of Work

Initiate study on an experimental basis of an assessment of the cost effectiveness and resource management implications of establishing guaranteed public access to coal sale tracts as a long-term policy.

Procedure

*Assign ATROW in DSC to analyze problem

Timeframe

Complete by August, 1979, depending upon scope of study *

Team

Lead: BLM (DSC-306 Access and Transportation Right-Of-Way)

Members: (140) (460 - Access and Transportation Right-Of-Way) and State Government Representatives

Location

Denver, Colorado

* Perhaps relationship to actual lease-needs may need to be included.

ACCESS TO COAL LEASE TRACTS

Issue: Should DOI acquire assured legal access to competitive coal lease tracts prior to lease offering?

Situation: Any coal leases offered under a new long-term policy must be awarded by competitive bidding. A competitive sale requires at least two bidders. A lease tract may attract a larger number of bidders if all bidders are assured equal opportunity for access to the tract.

The 200 plus existing competitive coal leases attracted an average of less than two bidders. The vast majority received only one bid. One reason for this low number may have been the lack of assured access. In a similar situation involving BLM timber sales in the Northwest, the adoption and implementation of a policy of assured access across checkerboard lands resulted in a substantial increase in the number of bidders and the level of high bids. The details of the success of guaranteeing access to timber tracts are discussed in the attached BLM PDOD, dated July 1975.

Guaranteeing access to coal tracts would involve easement acquisition and granting rights-of-way across Federal surface for roads, powerlines, and railroad spurs, utilizing where possible the corridor concept to minimize duplication or environmental degradation.

The situation will remain complex, whether the burden of access acquisition remains with successful bidders, or is taken on by BLM. This complexity

is evidenced by the convoluted surface ownership patterns within the known recoverable coal resource areas (KRCRA's) in Montana, North Dakota, Wyoming, and Colorado. Surface ownership patterns in KRCA's in Utah and New Mexico are generally more regular, and involve large blocks of Public Domain.

The current BLM policy for access to all leasable minerals is caveat emptor - let the buyer beware (BLM I.M. 78-67, copy attached).

In the following discussion of alternatives, it is assumed that surface owner consent would be acquired prior to pursuing guaranteed access. Further, it should be recognized that while guaranteed access may increase the level of bids, the majority of Federal receipts for the coal will continue to come from royalty payments.

LEGAL CONSTRAINTS:

1. Coal leases must be awarded by competitive bidding.

2. No bid shall be accepted which is less than fair market value.

3. DOE has responsibilities for promulgating regulations for fostering competition for Federal leases.

These three requirements relate to an overriding issue as to whether DOI (and DOE) will take an active or passive role in fostering competition.

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3. DOI has responsibilities for promulgating regulations for fostering competition for federal leases.

These three requirements relate to an overriding issue as to whether DOI (and DOE) will take an active or passive role in fostering competition.

4. Adoption of a policy of guaranteed access to coal leases may set a precedent that could be applied to other leasables. The extention of such a policy to oil and gas leases may be undesirable at this time, in view of the tremendous work load that would be involved. This question of precedent requires input from the Office of the Solicitor.

ANALYSIS:

Alternative A: Adopt the policy of acquiring assured legal access to competitive coal lease tracts prior to lease offering. For the mid-1980 target sale date, make every attempt to offer those tracts which are adjacent to public roads, common carrier railroads and/or Federal roads, and those tracts where only Federal surface is required for access. This would eliminate the time period required for easement acquisition. Many otherwise acceptable tracts in North Dakota, Montana, Wyoming, and Colorado would likely have to be postponed to possible later sales.

For sales held after 1980 (assuming a multi-year sale schedule), the policy would be applied only to those tracts which would likely support an new independent mining operation. For small tracts (by-pass and emergency) the policy should not be applied. Nor should the policy be applied to any tract where a coal company owns the surface and the company does not qualify as a surface owner under P.L 95-87, unless the company gives non-exclusive consent prior to DOI consideration of access.

4. Adoption of a policy of guaranteed access to coal lessor may set a precedent that could be applied to other lessables. The extension of such a policy to oil and gas leases may be undesirable at this time, in view of the tremendous work load that would be involved. This question of precedent requires input from the Office of the Solicitor.

ANALYSIS:

Alternative A: Adopt the policy of acquiring assured legal access to competitive coal lease tracts prior to lease offering. For the mid-1980 target sale date, make every attempt to offer those tracts which are adjacent to public roads, common carrier railroads and/or federal roads, and those tracts where only federal surface is required for access. This would eliminate the time period required for easement acquisition. Many otherwise acceptable tracts in North Dakota, Montana, Wyoming, and Colorado would likely have to be postponed to possible later sales.

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Access needs would be initially identified in BLMs MFP process, including multi-resource access needs. For those tracts addressed in site-specific environmental statements, access would be part of the proposed action. Prior to offering any tracts which survive the ES, access would acquired. Access rights would be assigned to the high bidder. The lease would stipulate ROW maintenance and other requirements. The incorporation of the policy into long term procedures would avoid much of the 6 to 18 month lead time.

Pros:

1. Would likely increase the number of bidders.

2. Would likely increase the level of the high bid.

3. Would allow for access routes which are environmentally preferred and which best serve access needs of other resource programs.

4. Would avoid duplicate access.

5. Would avoid adverse comment from those potential bidders who are not in a favorable access position with respect to unleased Federal coal.

Access needs would be initially identified in BLM's MFP process, including multi-resource access needs. For those tracts addressed in site-specific environmental statements, access would be part of the proposed action. Prior to offering any tracts which survive the EIS, access would acquired. Access rights would be assigned to the high bidder. The lease would stipulate ROW maintenance and other requirements. The incorporation of the policy into long term procedures would avoid much of the 6 to 18 month lead time.

Pros:

1. Would likely increase the number of bidders.

2. Would likely increase the level of the high bid.

3. Would allow for access routes which are environmentally preferred and which best serve access needs of other resource programs.

4. Would avoid duplicate access.

5. Would avoid adverse comment from State Essential Bidders who are not in a favorable access position with respect to unleased Federal coal.

Cons:

1. Would stimulate adverse comment from potential bidders who now have a favorable access position to unleased Federal coal, and from non-Federal surface owners who would otherwise stand to gain monetarily under the status quo.

2. Would require increased manpower and costs to develop and maintain the program.

3. Would possibly add a few months to sale schedule to allow for surveying, negotiating for, and possibly condemning non-Federal routes.

4. Would add the most dollars and man-months to the cost of the program compared to other alternatives.

Alternative B: For the mid-1980 sale, offer tracts as under Alternative A. For the next subsequent sale, offer on an experimental basis a limited number of tracts with guaranteed access to the successful bidder.

Pros:

1. Would allow assessment of the cost effectiveness of establishing guaranteed access as a long-term policy. The cost of establishing the access could be compared with the

amount that the high bids exceed the pre-sale estimate of fair market value.

2. Would likely attract a large number of bidders on the experimental tracts.

3. Would likely increase the level of high bids on the experimental tracts.

4. Would allow establishment of access routes which would be environmentally preferred and which would best serve other resource programs.

Cons:

1. May attract an unusually high number of bidders and unusually high bids, due to the potentially one-time nature of the experimental sale. Benefit/cost analysis may therefore be biased on the high side.

2. Would stimulate adverse comment from potential bidders who are now in a favorable access position with respect to the experimental tracts.

3. Would stimulate adverse comment from those non-Federal surface owners who would otherwise stand to gain monetarily under the status quo.

4. Would add a few months to sale schedule to allow for surveying a route and negotiate or possibly condemn for access rights.

5. Would add relatively small amounts of dollars and man-months to cost of the program.

Alternative C: For all sales offer only (1) those tracts where access would involve only Federal surface; (2) those tracts adjoining existing public roads and/or common carrier railroads.

Pros:

1. Would avoid manpower and dollar costs which would be incurred in securing access on and across non-Federal ownership.

2. Would avoid the period required to negotiate or possibly condemn for access rights.

3. Would likely increase the number of bidders.

4. Would likely increase the level of high bids.

5. (a) Would confine access to existing roads or railroads or (b) would foster through in-place BLM right-of-way procedures those access routes across Federal surface which are environmentally preferred and which would best serve other resource programs.

Cons:

1. May require additional manpower to process Federal ROW's, compared to status quo.

2. May stimulate adverse comment from those potential bidders who now hold access rights across non-Federal surface adjoining unleased Federal coal.

3. May stimulate adverse comment from non-Federal surface owners who otherwise stand to gain monetarily under status quo.

4. Would eliminate some potential lease tracts which are otherwise attractive from an environmental and/or economic standpoint.

4. Would likely increase the level of high bids.

5. (a) Would confirm access to existing roads or railroads or
(b) would foster through in-place BLM right-of-way procedures
those access routes across Federal surface which are
environmentally preferred and which would best serve other
resource programs.

Cons:

1. May require additional manpower to process Federal ROW's,
compared to status quo.

2. May stimulate adverse comment from those potential bidders
who now hold access rights across non-Federal surface
adjoining unleased Federal coal.

3. May stimulate adverse comment from non-Federal surface
owners who otherwise stand to gain economically under status
quo.

4. Would eliminate some potential lease tracts which are
otherwise attractive from an environmental and/or economic
standpoint.

Alternative D: Maintain the status quo. Under this alternative the Department would continue to refrain from providing guaranteed access to coal lease tracts.

Pros:

1. Would avoid manpower costs which would be incurred in securing access on and across non-Federal ownership.

2. Would avoid adverse comment from prospective bidders who are now in a favorable access position with respect to unleased Federal coal.

3. Would avoid adverse comment from land owners (not necessarily bidders) whose lands lie in potential access corridors. They may otherwise object to possible revenue which could develop through BLM's acquiring access at prices less than amounts the landowner thinks the successful bidder might be willing to pay. They may also otherwise object to BLM's selection of a route which does not cross their lands.

4. Would avoid the period required to survey route and negotiate or possibly condemn for access rights.

Cons:

1. Would likely lessen the number of bidders on those tracts where access does not now exist.

2. Would likely reduce the level of the highest bid on those tracts where access does not now exist.

3. Would encourage development of access routes which may not be those preferred from an environmental standpoint.

4. Would lock-in access routes across Federal lands interspersed with non-Federal lands.

5. Would encourage road development which may not best serve other resource programs.

6. Would stimulate criticism from those potential bidders who are not in favorable access positions.

RECOMMENDATION: Access to Coal Lease Tracts

Alternative A: Adopt the policy of pre-sale guarantee of access, assuming that the application of the policy to coal leases will not set a precedent that could be applied to oil and gas leases. Restrict application of the policy to sales held after the mid-1980 sale. For the mid-1980 sale restrict offered tracts to those with minimum access problems.

Compared to the other alternatives this recommendation would provide the best opportunity for increased competition and for increased bids. Time added to sale schedules would be minimized as the program is integrated into the tract selection process.

The policy should be limited to those tracts which would independently support a new mine, where no single company has a unique competitive advantage with respect to the surface of the tract.

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Appendix III

3500 (142)

AUG 31 1978

Memorandum

To: Chief, Division of Access and Transportation Right-of-Way

Through: Assistant Director, Technical Services

From: Assistant to the Director for Coal Management

Subject: Comments on Coal Leasing Regulations - Assured Access

This acknowledges receipt of your comments on the subject regulations wherein you have expressed concern that assured access is not considered in the regulations. To this end, please be advised that special consideration will be given to this issue.

Assured access was one of the major issues which surfaced in our analysis of the original issue/option papers. This particular issue was identified and sent forward for Secretarial decision. Accordingly, on July 28, 1978, the Under Secretary made a series of decisions (copy attached) on Intraregional Matters. One of these decisions dealt with assured access whereby the Under Secretary's decision was to hold the matter Status Quo until the issue could be fully analyzed and prescribed for a timely decision.

In line with the Under Secretary's decision, this office will be making an in-depth study and analysis of assured access, at which time, we will be in touch and work closely with you on this very important matter.

William G. Leavell

Enclosure

cc:
DDRF
140:RF
140:Hold
142:DMitchell:8/31/78:mlb:x4537

cc: B. Gram, DER
J. Leshy, DER

United States Department of the Interior

OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20240

July 28, 1978

Memorandum

To: Secretary
All Assistant Secretaries
Solicitor

From: The Under Secretary

Subject: Decision on Intraregional Matters Affecting the Coal Leasing Process

A decision meeting was held on July 27, 1978. An issue paper was prepared, circulated, and recommendations received prior to the meeting. Representatives from each of the Assistant Secretaries and the Solicitor's Office attended the meeting. The following indicates my decision on the seven issues:

Issue 1. Role of Regional Planning Targets.

Decision - Targets will be used at the point of regional tract selection. Under this system industry would be asked to indicate tracts of interest in all those areas determined to be "suitable" for coal development. However, because in many cases the precentage of coal lease area will be small compared to the total area that is suitable, the planning process should identify certain areas within the "suitable" areas that will be identified as preferable.

Issue 2. Use of Industry Tract Interest.

Decision - Industry tract interest will be used to select "best" leasing tracts from suitable areas.

Issue 3. Should Land Suitability Criteria be adopted by the Department?

Decision - Criteria should be adopted by the Department. Specific criteria will be developed and reviewed by all Assistant Secretaries and the Solicitor.

Issue 4. Should Regional Comparisions be based on Areas or Specific Lease Tracts?

Decision - Rank by both areas and tracts. The Assistant Secretary, Fish, Wildlife, and Parks is on record that environmental values should be a ranking factor. Ranking factors will include many values including environmental.

Issue 5. Factor to be considered in Ranking and Selecting Tracts.

Decision - Only require coal leases to be issued within KRCRAs, but use coal quality (and CRO/CDP maps) as a factor in tract selection. As stated in issue 4, environmental and other factors will also be used in tract selection. The Assistant Secretary, Policy, Budget, and Administration is on record that it is important to examine the prioritization of areas for CRO/CDP mapping and to continually assess the benefits and costs of furthering this data gathering.

Issue 6. Preferences for Lease Patterns and Social Impacts.

Decision - Adopt no preference prior to planning but require ranking according to relative social impacts. (Factors other than social impacts will also be used.)

Issue 7. Should Access be Assured?

Decision - Status Quo. This issue will be fully analyzed and presented for a timely decision.

Appendix IV

IN REPLY REFER TO:

United States Department of the Interior

3500 (932)

BUREAU OF LAND MANAGEMENT
222 North 32nd Street
P.O. Box 30157
Billings, Montana 59107

APR 27 1979

Mr. Arthur Neill
Western Energy Co.
Suite 204, 404 N. 31st Street
Billings, Montana 59101

Dear Mr. Neill:

This is to confirm the meeting date arranged for by Ed Hughes of our office for Mr. Raymond L. Johnson of BLM's Denver Service Center. Mr. Johnson will be at your office at 11 a.m. on May 2, 1979, if that is satisfactory. The interview will last approximately one hour.

The purpose of the meeting will be to discuss with you an alternative the Secretary of Interior is studying for future competitive coal leases. The objective of the study is to determine whether guaranteeing access to federal coal leases will foster competition and insure a fair return to the public.

The following type of questions will give you an idea of the information being sought:

1. How do companies presently gain access to develop federal coal leases?

2. Do you have any information or estimate of what acquisition cost to a coal lease would be?

3. Do you feel that higher bids would be received if the Federal Government guaranteed access to the lease area?

4. Would individual companies bid on more coal leases if the Federal Government guaranteed access to the lease area?

The study report will be submitted August 31, 1979, and will include information gathered throughout Montana, Colorado, Utah, New Mexico, and Wyoming so that the Secretary will be able to make an informed decision on whether to assure access to competitive coal leases.

We appreciate your cooperation and willingness to aid us in this endeavor.

Sincerely yours,

Ed Zaidlicz

Edwin Zaidlicz
State Director

cc:
Raymond Johnson - DSC-306

IN REPLY REFER TO:
3500 (142)

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
WASHINGTON, D.C. 20240

January 26, 1979

Instruction Memorandum No. 79-219
Expires 9/30/80

To: SD's Montana, Wyoming, Colorado, Utah, New Mexico

From: Associate Director

Subject: Study of Guaranteeing Access to Competitive Coal Leases

The Secretary has requested a study of the costs of guaranteeing access to tracts of coal prior to bidding and whether the costs of acquisition outweigh the benefits which might accrue to the government in higher bids. The results of the study are needed for the Secretary to weigh and implement certain coal leasing program alternatives.

The study will be conducted within the program parameters of Chapters 1, 2 and 3 of the Federal Coal Management Program Draft Environmental Statement, December 1978. Particular discussions regarding guaranteeing access are found under "Policy Options," Table 3-3 (Pages 3-35) and under "Planned and On-Going Studies," Paragraph 3.4 (Pages 3-43). The objective of the study is to determine whether guaranteeing access to Federal coal leases will foster competition and ensure a fair return to the public for use of their resources.

Ray Johnsen (D-306) has been appointed study team leader and he will be working closely with this office (140) in conducting the study. Team members are Alexander Kennedy, Wyoming SO; Don Mitchell, WO 140; Bob Anderson WO 723; and Joseph Gribbin, DOE, and others as time permits. The study team will assemble in Denver, February 5-7, 1979, to formulate plans for interviewing Government and industry representatives, collecting coal-lease bid information and studying coal-lease procedures. A block of rooms has been reserved at the Foothills Ramada, 11595 W. 6th Avenue, Denver (Lakewood); however, you should confirm your own rooms by calling (303) 238-7751.

The study team will need your assistance and I ask your help so that all available information may be brought to the Secretary that he may be able to make an informed judgment on whether to assure access to competitive coal leases. The study report will be completed by August 31, 1979.

We plan to schedule a meeting with each state during March 1979. Prior to this time, please review the enclosed listing from the Automated Coal Lease Data System of 161 competitive coal leases issued since 1960. Ascertain answers to the following questions for each lease under your respective jurisdictions and prepare a written report to include the following:

1. Was there legal access, i.e. State, County or Federal right-of-way, to the lease area?

2. Is there any indication that access influenced lease bidding?

3. Is the lease now, or has it in the past, produced coal?

4. Has there been an assignment of the lease? If so, to whom?

5. Do you have any other relevant information concerning the leases which would aid the study?

Please have the serialized case files available for review and be prepared to discuss and submit the written report upon our visit to your office. If you have any questions, please contact Ray Johnsen (D-306) FTS 234-4971.

Arnold E. Petty
Acting

1 Enclosure:
Encl. 1 - Competitive Coal Lease Listing

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TIME 16:05:35

TIME 16:06:00

PRINT FULL : ( ( ( 3 ) " STATE " , ( 17 ) " COUNTY " , ( 30 ) " PLANNING UNIT " , ( 47 ) " SERIAL NO. " , ( 60 ) " LATITUDE " , (
 71 ) " LONGITUDE " ) ) , ( ( 1 ) " ---------- " , ( 15 ) " ---------- " , ( 29 ) " ---------- " , ( 47 ) " ---------
 " , ( 60 ) " --------- " , ( 71 ) " --------- " ) , ( ( 1 ) STATE PHYSICAL LOCATION , ( 15 ) COUNTY , ( 29 ) NAME OF PLANNING UNIT
 IN WHICH APPLN. OCCURS , ( 47 ) SERIAL NUMBER , ( 60 ) LAT-DEGREES , ( 63 ) LAT-MINUTES , ( 66 ) LAT-SECONDS , ( 71 ) LONG-DEGREES
 , ( 75 ) LONG-MINUTES , ( 78 ) LONG-SECONDS ) , ( ( ( 27 ) " BLM SURFACE " , ( 45 ) " USFS SURFACE " , ( 62 ) " OTHER FED SURF " ,
 ( 81 ) " STATE SURFACE " , ( 98 ) " PRIVATE SURFACE " , ( 117 ) " INDIAN SURFACE " ) ) , ( ( 26 ) " ---------- " , ( 44 ) "
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---------- " ) , ( ( 26 ) BLM SURFACE CONTROL , ( 44 ) U.S. FOREST SERVICE SURFACE CONTROL , ( 62 ) OTHER FEDERAL AGENCY
 SURFACE CONTROL , ( 80 ) STATE SURFACE CONTROL , ( 98 ) PRIVATE SURFACE CONTROL , ( 117 ) NATIVE-AMERICAN SURFACE CONTROL ) FOR
 LEASE TYPE = COMPETITIVE LEASE AND DATE ORIGINAL LEASE ISSUED = 19600000 TO 19781231 ;

QUERY RESPONSE: 161 OUT OF 533 COAL LEASES AS OF OCTOBER 1, 1978, OR 30.21 PERCENT.

--- VALUES FOR ELEMENT   34 OF PRINT LIST WILL BE TRUNCATED
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"STATE" "COUNTY" "PLANNING UNIT" "SERIAL NO." "LATITUDE" "LONGITUDE"

TATE PHYSICA/COUNTYION NAME OF PLANNING /SERIAL NUMBERLA/LA/LAT-/LON/LO/LONG-SECONDS

"BLM SURFACE" "USFS SURFACE" "OTHER FED SURF" "STATE SURFACE" "PRIVATE SURFACE" "INDIAN SURFACE"

BLM SURFACE CONTR/U.S. FOREST SERVI/OTHER FEDERAL AGE/STATE SURFACE CON/PRIVATE SURFACE CO/NATIVE-AMERICAN

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
LABAMA	FAYETTE	UNDESIGNATED	ES122A4	33 36 20	87 33 45

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
----	----	----	----	2388.0 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
LORADO	DELTA	NORTH FORK	C033301	38 57 30	107 31 30

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
82.0 ACRES	543.0 ACRES	----	----	----	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
OLORADO	DELTA	NORTH FORK	C25079	38 54 30	107 37 30

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
311.0 ACRES	----	----	----	----	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
OLORADO	GUNNISON	NORTH FORK	C0117192	38 54 30	107 28 30

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
----	162.0 ACRES	----	----	1081.0 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
OLORADO	GUNNISON	NORTH FORK	C051669	38 54 30	107 30 0

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
372.0 ACRES	----	----	----	720.0 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
OLORADO	GUNNISON	NORTH FORK	C1362	38 52 50	107 27 0

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
COLORADO	GUNNISON	NORTH FORK	C17130	38 56 35	107 25 30

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
241.0 ACRES	----	----	----	----	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
COLORADO	GUNNISON	SAPINERO	C069942	38 45 0	107 0 0

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
----	----	----	----	80.0 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
COLORADO	GUNNISON	UNDESIGNATED	C0115606	39 10 5	107 22 55

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
----	80.0 ACRES	----	----	----	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
COLORADO	GUNNISON	UNDESIGNATED	C0125456	39 10 30	107 23 20

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
----	80.0 ACRES	----	----	----	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
COLORADO	GUNNISON	UNDESIGNATED	C0125485	39 9 30	107 20 0

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
----	200.0 ACRES	----	----	----	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
COLORADO	GUNNISON	UNDESIGNATED	C030344	39 9 30	107 21 0

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
----	517.0 ACRES	----	----	----	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
COLORADO	GUNNISON	UNDESIGNATED	C030345	39 10 0	107 23 5

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
----	117.0 ACRES	----	----	----	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
COLORADO	GUNNISON	UNDESIGNATED	C030346	39 9 0	107 18 30

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
----	640.0 ACRES	----	----	----	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
COLORADO	GUNNISON	UNDESIGNATED	C068369	38 50 0	107 27 22

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
----	560.0 ACRES	----	----	----	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
COLORADO	GUNNISON	UNDESIGNATED	C12638	39 9 15	107 23 30

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
----	315.0 ACRES	----	----	----	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
COLORADO	GUNNISON	UNDESIGNATED	C12640	39 9 45	107 23 20

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
----	40.0 ACRES	----	----	----	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
COLORADO	GUNNISON	UNDESIGNATED	C7853	39 9 15	107 21 30

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
----	717.0 ACRES	----	----	----	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
COLORADO	JACKSON	NORTH PARK	C0123177	40 32 56	106 25 29

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
194.0 ACRES	----	----	----	1513.0 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
COLORADO	JACKSON	NORTH PARK	C038472	40 34 30	106 27 5

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
----	----	----	----	120.0 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
COLORADO	MOFFAT	WILLIAMS FORK	C0125957	40 38 47	107 22 4

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
39.0 ACRES	----	----	----	3823.0 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
COLORADO	MOFFAT	WILLIAMS FORK	C0126480	40 25 15	107 38 15

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
79.0 ACRES	----	----	----	288.0 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
COLORADO	MOFFAT	WILLIAMS FORK	C0127865	40 24 7	107 38 14

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
----	----	----	----	43.0 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
COLORADO	MOFFAT	WILLIAMS FORK	C079641	40 25 34	107 30 44

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
----	----	----	----	1352.0 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
COLORADO	PITKIN	UNDESIGNATED	C09004	39 11 45	107 23 30

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
----	1529.0 ACRES	----	----	----	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
COLORADO	RIO BLANCO	MEEKER	C1545	40 6 55	107 50 19

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
280.0 ACRES	----	----	----	616.0 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
COLORADO	RIO BLANCO	MEEKER	C1546	40 9 0	107 49 10

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
12.0 ACRES	----	----	----	1084.0 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
COLORADO	RIO BLANCO	MEEKER	C245	40 11 5	107 50 0

		82.9 ACRES	----	----	----	143.0 ACRES	----		
STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE				
COLORADO	ROUTT	WILLIAMS FORK	C0114093	40 22 42	107 10 40				
	BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE			
	320.0 ACRES	----	----	----	1000.0 ACRES	----			
STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE				
COLORADO	ROUTT	WILLIAMS FORK	C0127592	40 18 10	107 0 0				
	BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE			
	----	----	----	----	80.0 ACRES	----			
STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE				
COLORADO	ROUTT	WILLIAMS FORK	C086654	40 29 50	107 7 55				
	BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE			
	----	----	----	----	160.0 ACRES	----			
STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE				
COLORADO	ROUTT	WILLIAMS FORK	C088149	40 26 45	107 8 20				
	BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE			
	----	----	----	----	2280.0 ACRES	----			
STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE				
COLORADO	ROUTT	WILLIAMS FORK	C16284	40 20 45	107 1 52				
	BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE			
	120.0 ACRES	----	----	----	143.0 ACRES	----			
STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE				
COLORADO	ROUTT	WILLIAMS FORK	C20900	40 22 30	107 4 50				
	BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE			
	----	----	----	----	419.9 ACRES	----			
STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE				
KENTUCKY	CLAY	UNDESIGNATED	ES12847	37 13 15	83 32 30				
	BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE			

			362.0 ACRES						

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
MONTANA	BIG HORN	DECKER-SIBLEY	M057934	45 4 40	106 49 5

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
80.0 ACRES	----	----	----	640.0 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
MONTANA	BIG HORN	DECKER-SIBLEY	M057934A	45 3 20	106 50 50

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
----	----	----	----	1841.0 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
MONTANA	BIG HORN	DECKER-SIBLEY	M061685	45 3 30	106 50 55

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
80.0 ACRES	----	----	----	2280.0 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
MONTANA	BIG HORN	DECKER-SIBLEY	M061686	45 1 10	106 53 4

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
----	----	----	----	1196.0 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
MONTANA	BIG HORN	DECKER-SIBLEY	M069782	45 6 10	106 54 20

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
237.0 ACRES	----	----	----	2110.0 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
MONTANA	BIG HORN	DECKER-SIBLEY	M069945	45 0 35	106 59 25

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
159.0 ACRES	----	----	----	362.0 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
MONTANA	BIG HORN	DECKER-SIBLEY	M073093	45 3 32	106 43 50

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
279.0 ACRES	----	----	----	2163.0 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
MONTANA	DAWSON	RICHLAND-GLENDVE	M3831	47 24 0	104 38 0

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
----	----	----	----	2537.0 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
MONTANA	DAWSON	RICHLAND-GLENDVE	M3832	47 25 0	104 40 0

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
----	----	----	----	2559.0 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
MONTANA	MUSSELSHELL	BULL MOUNTAINS	M052647	46 15 0	108 24 30

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
----	----	----	----	80.0 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
MONTANA	ROSEBUD	SOUTH ROSEBUD	M073109	45 51 25	106 47 55

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
40.0 ACRES	----	----	----	5752.0 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
MONTANA	ROSEBUD	SOUTH ROSEBUD	M15965	45 47 50	106 40 15

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
320.0 ACRES	----	----	----	3987.0 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
NEW MEXICO	SANDOVAL	UPPER RIO PUERC	NM0555317	35 56 0	106 58 0

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
1366.0 ACRES	----	----	----	840.0 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
NEW MEXICO	SANDOVAL	UPPER RIO PUERC	NM732	35 54 45	106 57 45

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
160.0 ACRES	----	----	----	----	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
NEW MEXICO	SAN JUAN	SAN JUAN	NM0186612	36 15 30	108 15 0

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
1027.0 ACRES	----	----	----	----	1161.0 ACRES

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
NEW MEXICO	SAN JUAN	SAN JUAN	NM0186613	36 20 30	108 15 0

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
1200.0 ACRES	----	----	----	40.0 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
NEW MEXICO	SAN JUAN	SAN JUAN	NM0186615	36 14 30	108 10 30

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
2027.0 ACRES	----	----	----	----	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
NEW MEXICO	SAN JUAN	SAN JUAN	NM0315559	36 58 15	108 8 30

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
1635.9 ACRES	----	----	----	208.3 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
NEW MEXICO	SAN JUAN	CHACO	NM2457	35 57 0	107 29 15

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
160.0 ACRES	----	----	5136.0 ACRES	320.0 ACRES	720.0 ACRES

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
NORTH DAKOTA	MERCER	----	M070203	47 14 30	101 20 35

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
NORTH DAKOTA	MERCER	MERCER	M041765	47 12 22	101 46 31

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
----	----	----	----	1600.0 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
NORTH DAKOTA	MERCER	MERCER	M042819	47 19 2	101 51 1

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
----	----	----	----	764.0 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
NORTH DAKOTA	MERCER	MERCER	M071813	47 23 10	101 51 58

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
----	----	----	----	2034.0 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
NORTH DAKOTA	MERCER	MERCER	M163	47 26 2	101 55 10

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
----	----	----	----	400.0 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
NORTH DAKOTA	MERCER	MERCER	M37829	47 27 45	101 52 15

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
----	----	----	----	322.0 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
NORTH DAKOTA	OLIVER	OLIVER	M043848	47 7 30	101 17 30

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
----	----	----	----	2325.0 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
NORTH DAKOTA	OLIVER	OLIVER	M11269	47 13 30	101 20 15

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
----	----	----	----	160.0 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
NORTH DAKOTA	WARD	WARD	M15896	48 56 13	101 0 13

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
----	----	----	----	40.0 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
NORTH DAKOTA	WILLIAMS	----	M061025	48 9 40	103 34 5

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE

								80.0 ACRES	

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
NORTH DAKOTA	WILLIAMS	----	M065329	48 10 38	103 34 15

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
----	----	----	----	320.0 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
OKLAHOMA	COAL	SE OKLAHOMA	NM3174	34 34 0	96 7 0

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
----	----	----	----	2840.0 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
OKLAHOMA	HASKELL	SE OKLAHOMA	NM957	35 23 0	95 1 15

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
----	----	----	----	3342.0 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
OKLAHOMA	LE FLORE	SE OKLAHOMA	NM0141015	34 52 30	94 38 0

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
----	----	----	----	360.0 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
OKLAHOMA	LE FLORE	SE OKLAHOMA	NM0161332	35 3 45	94 40 15

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
----	----	----	----	2560.0 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
OKLAHOMA	LE FLORE	SE OKLAHOMA	NM0536361	34 56 30	94 40 0

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
----	----	----	----	561.0 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
OKLAHOMA	LE FLORE	SE OKLAHOMA	OK0557450	34 55 45	94 37 30

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
240.0 ACRES	----	----	----	600.0 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
PENNSYLVANIA	INDIANA	UNDESIGNATED	ES13805	40 27 40	79 14 45

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
----	----	51.0 ACRES	----	----	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
PENNSYLVANIA	INDIANA	UNDESIGNATED	ES9403	40 28 0	79 19 20

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
----	----	30.0 ACRES	----	----	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
UTAH	CARBON	----	U0142235	-- -- 0	--- -- 0

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
----	520.0 ACRES	----	----	----	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
UTAH	CARBON	----	U067496	39 37 26	111 10 47

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
----	240.0 ACRES	----	261.0 ACRES	----	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
UTAH	CARBON	----	U073126	39 40 57	111 12 58

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
----	557.0 ACRES	----	----	----	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
UTAH	CARBON	----	U7949	39 31 6	110 47 40

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
----	----	----	----	240.0 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
UTAH	CARBON	BATTIS	U0146345	-- -- 0	--- -- 0

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
440.0 ACRES	----	----	320.0 ACRES	400.0 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
UTAH	CARBON	[illegible]	08319	39 42 11	111. 5 0

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
----	----	----	486.0 ACRES	403.0 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
UTAH	CARBON	PRICE RIVER	U0092147	39 41 4	110 35 15

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
360.0 ACRES	----	----	320.0 ACRES	----	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
UTAH	CARBON	RANGE CREEK	U0144820	39 42 56	110 34 7

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
----	----	----	2212.0 ACRES	----	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
UTAH	CARBON	RANGE CREEK	U0146779	39 40 0	110 46 40

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
120.0 ACRES	----	40.0 ACRES	----	1080.0 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
UTAH	CARBON	RANGE CREEK	U0039706	39 38 18	110 27 17

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
1636.0 ACRES	----	----	520.0 ACRES	401.0 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
UTAH	CARBON	RANGE CREEK	U0069096	39 42 24	110 35 18

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
----	----	----	480.0 ACRES	----	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
UTAH	EMERY	----	U0147570	-- -- 0	--- -- 0

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
----	2093.0 ACRES	----	----	----	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
UTAH	EMERY	----	U026319	-- -- 0	--- -- 0

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE	BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
UTAH	EMERY	----	U026583	-- -- 0	--- -- 0	----	1040.0 ACRES	----	----	----	----
UTAH	EMERY	----	U046151	-- -- 0	--- -- 0	----	1000.0 ACRES	----	----	----	----
UTAH	EMERY	----	U048625	-- -- 0	--- -- 0	----	640.0 ACRES	----	480.0 ACRES	----	----
UTAH	EMERY	----	U062996	-- -- 0	--- -- 0	----	40.0 ACRES	----	----	----	----
UTAH	EMERY	----	U063066	-- -- 0	--- -- 0	----	1285.0 ACRES	----	1200.0 ACRES	----	----
UTAH	EMERY	----	U064923	-- -- 0	--- -- 0	----	1015.0 ACRES	----	1237.0 ACRES	----	----
UTAH	EMERY	----	U064924	-- -- 0	--- -- 0	----	----	----	----	----	----

			1211.0 ACRES						

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
UTAH	EMERY	----	U13097	39 30 18	111 6 48

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
----	1360.0 ACRES	----	----	----	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
UTAH	EMERY	----	U1358	-- -- 0	--- -- 0

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
----	320.0 ACRES	----	----	----	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
UTAH	EMERY	----	U2610	-- -- 0	--- -- 0

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
----	80.0 ACRES	----	----	----	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
UTAH	EMERY	----	U7653	-- -- 0	--- -- 0

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
----	412.0 ACRES	----	----	----	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
UTAH	EMERY	RANGE CREEK	U0126947	39 24 34	110 17 53

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
1912.0 ACRES	----	----	80.0 ACRES	----	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
UTAH	EMERY	RANGE CREEK	U0126948	39 27 11	110 17 19

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
2523.0 ACRES	----	----	----	----	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
UTAH	EMERY	MUDDY	U0713039	38 46 30	111 17 30

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
2576.0 ACRES	----	----	----	----	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
UTAH	EMERY	MUDDY	U073040	38 46 30	111 16 30

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
2542.0 ACRES	----	----	----	----	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
UTAH	EMERY	LAST CHANCE	U073041	38 45 0	111 17 30

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
2558.0 ACRES	----	----	----	----	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
UTAH	KANE	VERMILION HILLS	U0147999	37 19 22	112 20 25

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
320.0 ACRES	----	----	----	----	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
UTAH	KANE	ZION	U0101153	37 19 30	112 26 16

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
1000.0 ACRES	----	----	----	----	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
UTAH	KANE	ZION	U0140770	37 18 16	112 23 44

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
519.0 ACRES	----	----	----	----	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
UTAH	KANE	ZION	U0149582	37 20 28	112 16 27

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
440.0 ACRES	----	----	----	120.0 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
UTAH	KANE	ZION	U060745	37 25 0	112 27 30

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
831.0 ACRES	----	----	----	1661.0 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
UTAH	KANE	ZION	U066746	37 22 9	112 25 56

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
1760.0 ACRES	----	----	----	560.0 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
UTAH	KANE	ZION	U065012	37 23 1	112 28 3

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
755.0 ACRES	----	----	----	----	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
UTAH	KANE	ZION	U083072	37 23 23	112 29 30

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
320.0 ACRES	----	----	----	720.0 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
UTAH	KANE	ZION	U096705	37 22 9	112 31 12

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
1967.0 ACRES	----	----	----	320.0 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
UTAH	KANE	PARIA	U0146654	37 7 30	111 33 39

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
2560.0 ACRES	----	----	----	----	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
UTAH	KANE	PARIA	U083000	37 23 0	111 28 48

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
1440.0 ACRES	----	----	----	----	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
UTAH	KANE	PARIA	U083005	37 20 55	111 28 44

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
640.0 ACRES	----	----	----	----	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
UTAH	SEVIER	FISHLAKE	U018901A	38 55 0	111 24 30

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
----	240.0 ACRES	----	----	----	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
UTAH	SEVIER	FORREST	U053995	38 57 30	111 20 0

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
----	160.0 ACRES	----	----	----	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
UTAH	SEVIER	FORREST	U062453	38 57 0	111 23 0

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
----	480.0 ACRES	----	----	----	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
UTAH	SEVIER	FORREST	U090231	38 42 30	111 19 30

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
2497.0 ACRES	----	----	----	----	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
WASHINGTON	LEWIS	----	OR6527	46 44 0	122 46 0

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
----	----	----	241.0 ACRES	----	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
WYOMING	CAMPBELL	CAMPBELL	W0111833	44 16 0	105 22 45

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
----	----	----	----	80.0 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
WYOMING	CAMPBELL	CAMPBELL	W0312311	44 16 0	105 22 45

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
----	----	----	120.0 ACRES	760.0 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
WYOMING	CAMPBELL	CAMPBELL	W0313000	44 19 15	105 22 0

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE

			----	----	----	320.0 ACRES	1240.0 ACRES		----
STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE				
WYOMING	CAMPBELL	CAMPBELL	W0313667	44 12 0	105 21 45				
		BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE		
		----	----	----	----	2560.0 ACRES	----		
STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE				
WYOMING	CAMPBELL	CAMPBELL	W0313668	44 18 30	105 25 0				
		BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE		
		----	----	----	400.0 ACRES	1800.0 ACRES	----		
STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE				
WYOMING	CAMPBELL	CAMPBELL	W0313773	44 20 30	105 30 15				
		BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE		
		----	----	----	----	3520.0 ACRES	----		
STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE				
WYOMING	CAMPBELL	CAMPBELL	W0317682	44 5 0	105 23 0				
		BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE		
		----	----	----	----	2360.0 ACRES	----		
STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE				
WYOMING	CAMPBELL	CAMPBELL	W0321779	43 34 30	105 12 45				
		BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE		
		6102.0 ACRES	600.0 ACRES	----	----	4040.0 ACRES	----		
STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE				
WYOMING	CAMPBELL	CAMPBELL	W0325678	44 25 0	105 30 45				
		BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE		
		----	----	----	----	599.0 ACRES	----		
STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE				
WYOMING	CAMPBELL	CAMPBELL	W2313	43 41 45	105 15 0				
		BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE		
		1924.0 ACRES	920.0 ACRES	----	----	3200.0 ACRES	----		

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
WYOMING	CAMPBELL	CAMPBELL	W49644	44 16 45	105 22 30

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
----	----	----	----	80.0 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
WYOMING	CAMPBELL	CAMPBELL	W5035	44 18 0	105 26 0

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
40.0 ACRES	----	----	480.0 ACRES	4262.0 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
WYOMING	CAMPBELL	CAMPBELL	W5036	44 22 30	105 30 15

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
40.0 ACRES	----	----	----	5417.0 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
WYOMING	CAMPBELL	CAMPBELL	W56112	44 4 45	105 24 0

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
----	----	----	----	840.0 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
WYOMING	CAMPBELL	CAMPBELL	W60231	43 32 30	105 17 15

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
160.0 ACRES	160.0 ACRES	----	----	----	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
WYOMING	CAMPBELL	CAMPBELL	W385	44 0 15	105 21 15

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
40.0 ACRES	----	----	----	6520.0 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
WYOMING	CARBON	HANNA	W16465	41 52 30	105 37 30

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
8080.0 ACRES	----	----	----	600.0 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
WYOMING	CARBON	HANNA	W16466	41 52 30	106 45 0

		6315.0 ACRES	----	----	----	----	----	----	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
WYOMING	CARBON	HANNA	W25406	41 51 0	106 27 30

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
640.0 ACRES	----	----	----	----	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
WYOMING	CARBON	HANNA	W42354	41 55 0	106 45 0

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
1280.0 ACRES	----	----	----	----	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
WYOMING	CONVERSE	CONVERSE	W0136194	43 10 0	105 55 15

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
80.0 ACRES	----	----	----	242.0 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
WYOMING	CONVERSE	CONVERSE	W0136195	43 7 15	105 53 15

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
320.0 ACRES	----	----	----	1157.0 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
WYOMING	CONVERSE	CONVERSE	W0136196	43 11 30	105 52 30

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
200.0 ACRES	----	----	----	1360.0 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
WYOMING	CONVERSE	CONVERSE	W0244167	43 5 30	105 55 15

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
80.0 ACRES	----	----	----	1723.0 ACRES	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
WYOMING	CONVERSE	CONVERSE	W0312918	43 7 15	105 53 30

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE

		380.0 ACRES		----		----	40.0 ACRES	3379.0 ACRES		----
STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE					
WYOMING	CONVERSE	CONVERSE	W0321780	43 27 15	105 28 45					
		BLM SURFACE	USFS SURFACE	OTHER FED SURF		STATE SURFACE	PRIVATE SURFACE		INDIAN SURFACE	
		1060.0 ACRES	280.0 ACRES	----		----	1568.0 ACRES		----	
STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE					
WYOMING	CONVERSE	CONVERSE	W0322255	43 28 45	105 26 45					
		BLM SURFACE	USFS SURFACE	OTHER FED SURF		STATE SURFACE	PRIVATE SURFACE		INDIAN SURFACE	
		----	1280.0 ACRES	----		----	599.0 ACRES		----	
STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE					
WYOMING	JOHNSON	JOHNSON	W0321120	44 31 0	106 46 0					
		BLM SURFACE	USFS SURFACE	OTHER FED SURF		STATE SURFACE	PRIVATE SURFACE		INDIAN SURFACE	
		----	----	----		240.0 ACRES	4581.0 ACRES		----	
STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE					
WYOMING	LINCOLN	PIONEER TRAILS	W0294513	41 50 0	110 31 15					
		BLM SURFACE	USFS SURFACE	OTHER FED SURF		STATE SURFACE	PRIVATE SURFACE		INDIAN SURFACE	
		480.0 ACRES	----	39.0 ACRES		----	----		----	
STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE					
WYOMING	SHERIDAN	SHERIDAN	W0230621	44 42 30	106 3 0					
		BLM SURFACE	USFS SURFACE	OTHER FED SURF		STATE SURFACE	PRIVATE SURFACE		INDIAN SURFACE	
		----	----	----		----	2551.0 ACRES		----	
STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE					
WYOMING	SHERIDAN	SHERIDAN	W0240559	44 40 0	106 2 30					
		BLM SURFACE	USFS SURFACE	OTHER FED SURF		STATE SURFACE	PRIVATE SURFACE		INDIAN SURFACE	
		----	----	----		----	1620.0 ACRES		----	
STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE					
WYOMING	SHERIDAN	SHERIDAN	W961	44 44 30	106 7 30					
		BLM SURFACE	USFS SURFACE	OTHER FED SURF		STATE SURFACE	PRIVATE SURFACE		INDIAN SURFACE	
		1657.0 ACRES	----	----		----	19044.0 ACRES		----	

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
WYOMING	SWEETWATER	OVERLAND	A0313559	41 30 30	107 45 15

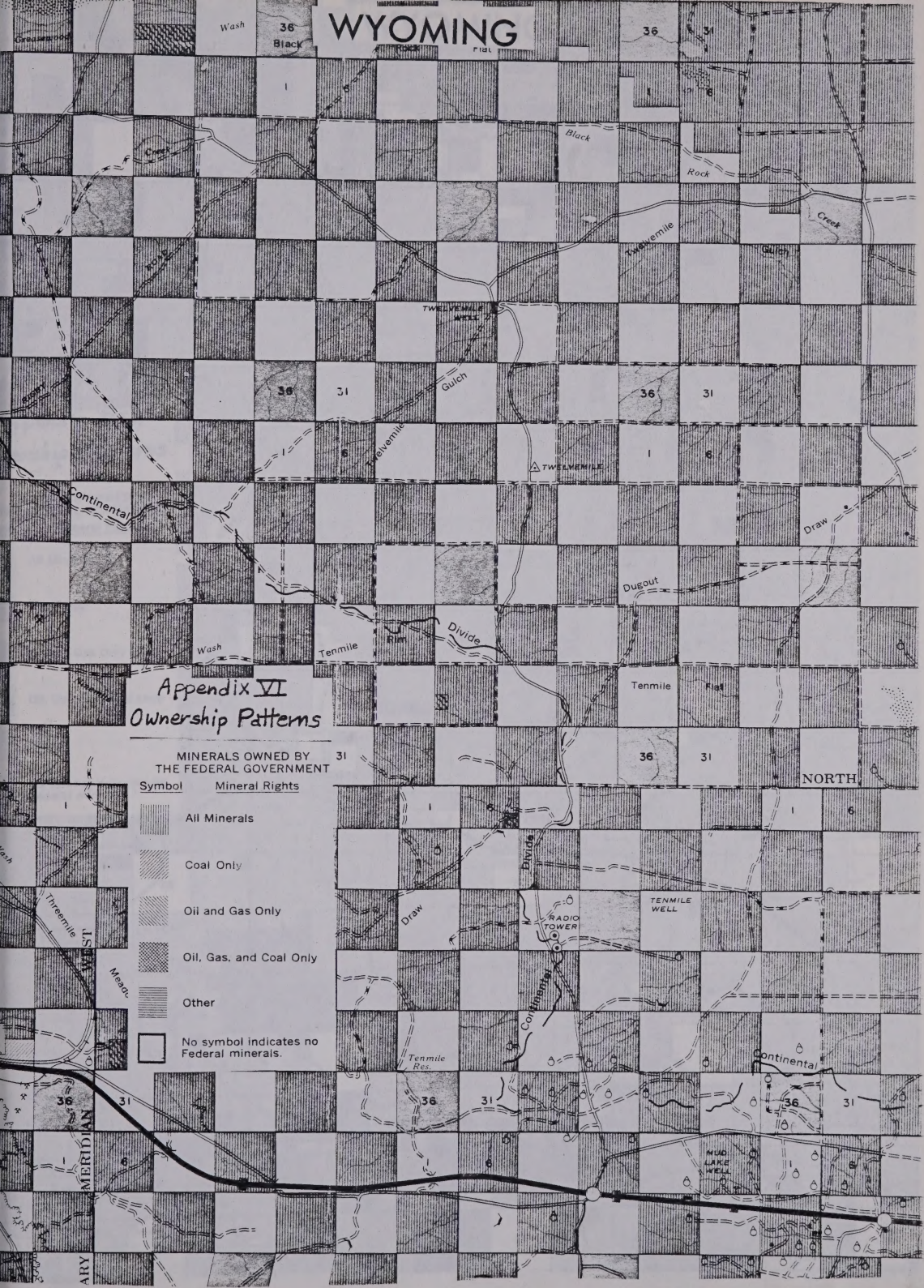
BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
640.0 ACRES	----	----	----	----	----

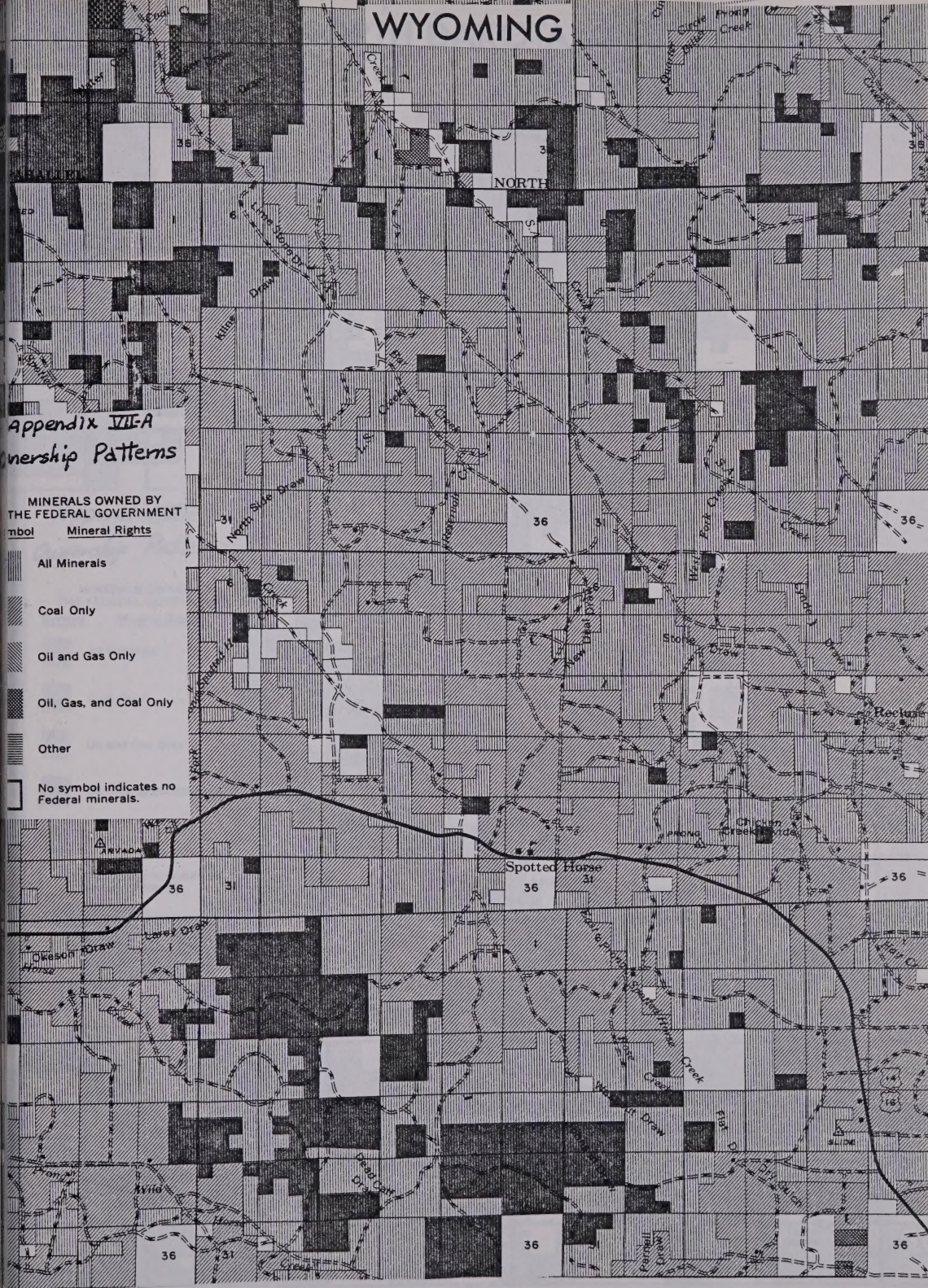
STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
WYOMING	SWEETWATER	PILOT BUTTE	A0313201	41 45 45	109 3 45

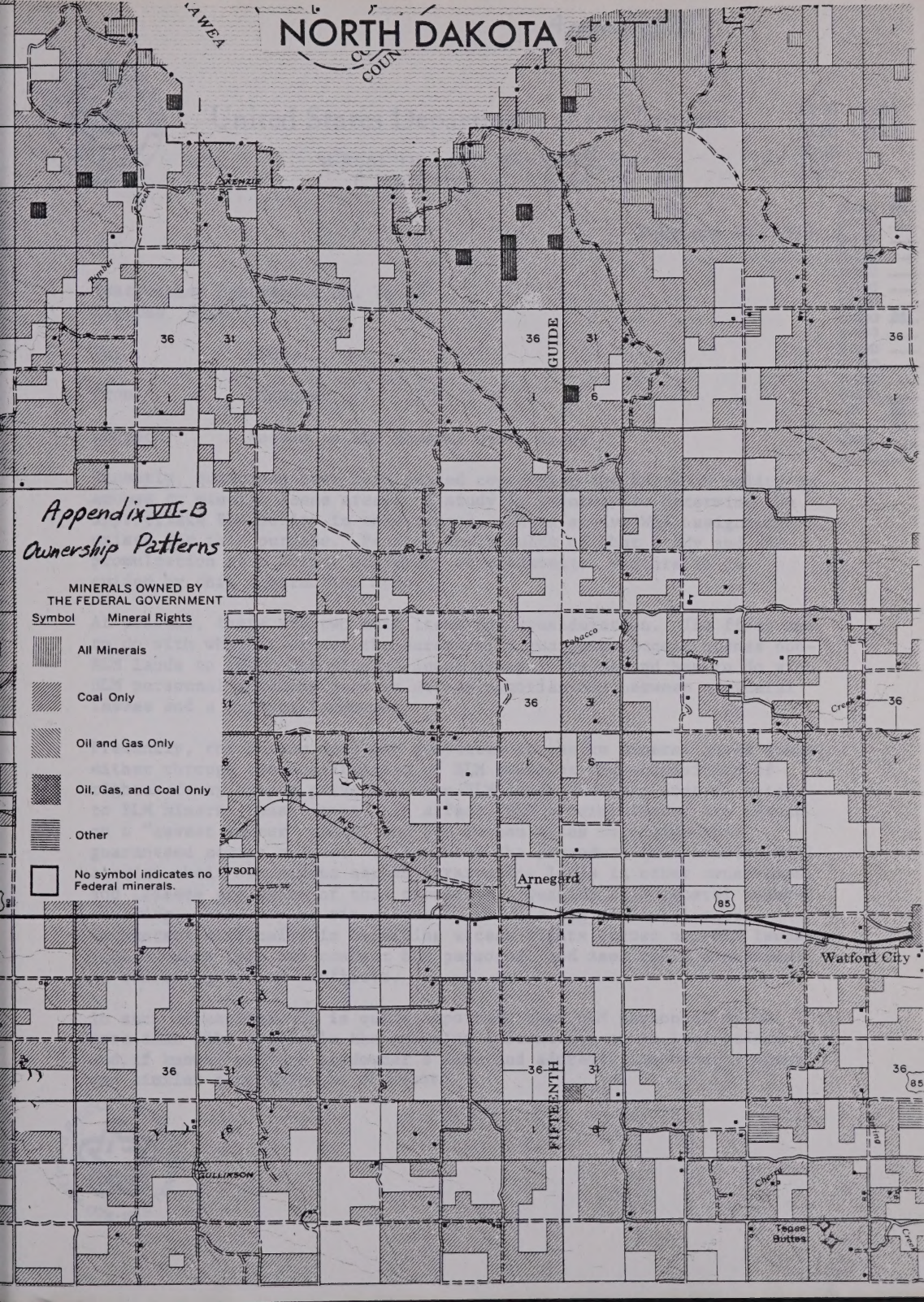
BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
14680.0 ACRES	----	----	----	----	----

STATE	COUNTY	PLANNING UNIT	SERIAL NO.	LATITUDE	LONGITUDE
WYOMING	SWEETWATER	PILOT BUTTE	A12793	41 39 45	109 13 30

BLM SURFACE	USFS SURFACE	OTHER FED SURF	STATE SURFACE	PRIVATE SURFACE	INDIAN SURFACE
1645.0 ACRES	----	----	----	----	----


WYOMING
Appendix VI
Ownership Patterns
MINERALS OWNED BY
THE FEDERAL GOVERNMENT
Symbol
Mineral Rights
All Minerals
Coal Only
Oil and Gas Only
Oil, Gas, and Coal Only
Other
No symbol indicates no
Federal minerals.
NORTH
WEST
Wash
Black Rock Flat
Black Rock Creek
Twelvemile Gulch
TWELVEMILE WELL
TWELVEMILE
Continental Draw
Dugout Draw
Tenmile Rim
Divide
Tenmile Flat
Threemile Draw
RADIO TOWER
TENMILE WELL
Continental Divide
Tenmile Res.
MUD LAKE WELL
36
31
1
6


WYOMING
Appendix VII-A
nership Patterns
MINERALS OWNED BY
THE FEDERAL GOVERNMENT
mbol
Mineral Rights
All Minerals
Coal Only
Oil and Gas Only
Oil, Gas, and Coal Only
Other
No symbol indicates no Federal minerals.
NORTH
Spotted Horse
Recluse
Chicken Creek Ave
Okeson Draw
Larey Draw
Stone Draw
North Side Draw
Kline Draw
Lime Stone Dr
Dead Calf Draw
Flat Dr
Dry Gulch
Parnell Draw
Rose Creek
Spotted Horse Creek
Wyoming Creek
Quarter Circle Prong Creek
Coal Creek
Reservoir Cr
New Deal Draw
West Fork Creek
Lynde Draw
Ayala
ARVADA
PRONG
SLIDE
36
31
6


NORTH DAKOTA
Appendix VII-B
Ownership Patterns
MINERALS OWNED BY
THE FEDERAL GOVERNMENT
Symbol
Mineral Rights
All Minerals
Coal Only
Oil and Gas Only
Oil, Gas, and Coal Only
Other
No symbol indicates no Federal minerals.
GUIDE
FIFTEENTH
Arnegard
Watford City
Tobacco
Garden
Creek
Cherry
Tepee Buttes
GULLIKSON
KENZIE
Bumber
Creek
85
36
31
6
1

Appendix VIII

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
WASHINGTON, D.C. 20240

2130 (460)
3100 (711)
3200
3500

D-100 I
D-110
D-120
D-130
D-140
D-150
D-200
D-300 A
D-400
D-500
D-600
D-700
D-800
LIB
RF F
BIND.

February 10, 1978

Instruction Memorandum No. 78-67
Expires 9/30/79

To: AFO's

From: Director

Subject: Access to BLM Mineral Lease Areas

Recently, questions have been raised concerning the Bureau's policy on access to mineral lease areas. A study is underway to determine the appropriate BLM policy in this regard, and an active WAR assignment exists for this purpose. Pending the results of that study and the promulgation of a policy statement or statements, you are to be guided by this Instruction Memo.

At present, there are two main items for consideration. The first has to do with whether or not the Bureau will guarantee access across non-BLM lands to reach BLM mineral lease areas. The second has to do with BLM personnel's taking part in access negotiations between a mineral lessee and a private landowner.

Presently, the Bureau does not guarantee access to mineral lease areas, either through the construction of BLM roads or the acquisition of rights-of-way across private or non-BLM lands that may control access to BLM mineral lease areas. In effect, BLM mineral leases are issued on a "caveat emptor" basis, and the Bureau makes no claims that guaranteed access exists. It has been the procedure that lessees will acquire their own access across intervening lands in other ownerships, and lessees are aware of this procedure. Despite this general understanding, there may be situations in which a BLM mineral lessee encounters difficulty in obtaining access rights across non-BLM lands. Such lessees then may contact BLM personnel and seek their assistance in resolving access conflicts.

In such situations, it is quite important that BLM personnel do no more than make available the existing information as to land status and, if known, private landowner's name and address, landowner's agent, and similar data which is of record.

AMERICAN REVOLUTION BICENTENNIAL 1776-1976

It is imperative that BLM personnel do not take part in the negotiations between the lessee and the landowner, or do anything that might lend credence to an agreement between them.

This is important because the BLM may find that its future negotiations for access across lands of that landowner or others could be compromised by BLM's taking part in or lending an aura of approval to an access agreement negotiated between the lessee and landowner. The lessee and landowner may have agreed to cash payments, toll fees, restrictions on public use of access routes, restrictions on hunting and other activities affecting public lands, and other items with which BLM could not agree, either from a legal or management standpoint. For BLM to take part in negotiations which would lend credence to such matters is not in the public interest.

This "hands off" policy does not mean that BLM should ignore access to Federal lands in areas where there are or may be mineral leases. Certainly, in establishing priorities for BLM acquisition of access for multiple-use management, including rights for members of the public to reach BLM lands for all legitimate purposes, the existence of mineral leases is a consideration. In particular, if there are existing private roads across non-BLM tracts which are "corks in the bottle" for access to areas of BLM land, the existence of mineral leases may be an important, high priority consideration. This will be especially the case if BLM's studies indicate that new roads to avoid these private tracts would be environmentally unacceptable. In such circumstances, it may be entirely appropriate for BLM to reexamine its access acquisition priorities and place such an area high on the list for acquisition of needed BLM access rights.

To summarize, at present BLM does not guarantee access to mineral lease areas. However, BLM may find it appropriate to acquire multiple-use access rights in areas where there are or may be BLM mineral leases.

BLM personnel are not to take part in negotiations between BLM mineral lessees and private landowners for private access rights. They may make available any information of record such as land status, road ownership, landowners' names and addresses, and similar information.

Should you have any questions on this Instruction Memo, please address them to the Director (460), or telephone the Division of Access and Transportation Rights-of-Way, FTS 343-2280.

George L. Turcott
Acting

BLM Library
Denver Federal Center
Bldg. 85, OC-521
P.O. Box 25047
Denver, CO 80225

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
WASHINGTON, D.C. 20240

2800 (162)

Memorandum

JUL 25 1980

To: Assistant Secretary, Land and Water Resources

From: Director

Subject: Guaranteed Access to Competitive Coal Leases

One of the major items in an issue paper forwarded to the Secretary during preparation of the Federal Coal Management Program Draft Environmental Statement was the question of guaranteeing access to competitive coal leases. The issue as stated, was "should the Department of the Interior (DOI) acquire assured legal access to competitive coal lease tracts prior to lease offerings?" The decision of the Under Secretary, on July 28, 1978, was to hold the matter status quo until the issue could be fully studied and presented for a timely decision.

The Bureau of Land Management has studied the issue of guaranteeing access. A study was conducted at the Denver Service Center, Office of Technical and Scientific Services, and was completed in August, 1979. Copies of the report, A Study of Guaranteed Access to Competitive Coal Leases, were provided to various offices in the Department and BLM for review and comment. A copy of this report is also enclosed for your reference.

The study does not provide convincing evidence that the benefits of a policy to provide guaranteed access to Federal coal leases would outweigh the costs. There is some indication that moderately increased competition could be expected and a possibility of slightly higher prices bid for the coal. However, this was based on an analysis of past Federal coal leasing procedures rather than the new Federal coal management program with which we have yet to gain experience in terms of competition and bidding. Another benefit that could be expected from a guaranteed coal access policy would be the opportunity to develop access where it would best serve multiple use management purposes. While this has certainly been true in our timber management program, we do not have sufficient evidence to offer this as a reason to adopt a policy for guaranteed access to coal leases.

Measured against what we believe at this time would be limited benefits from a general policy to obtain guaranteed access to all Federal coal leases there are some rather significant problems and costs. For example, the specific access requirements of any given coal lease tract prior to leasing and in the absence of a mining and development plan are speculative and would require substantial expenditure of

money and manpower that would otherwise be the responsibility of the lessee. Access acquisition typically requires long lead times that have not been provided in current schedules for coal program implementation. Moreover, the notion of precedent cannot be overlooked. A policy of guaranteed access for coal leasing is viewed with alarm by those involved with oil and gas leasing and other forms of mineral development.

Despite my conviction that a general policy of guaranteed access for coal leasing is inappropriate, I believe there may be occasions when guaranteed access would facilitate special leasing situations. For example, the concept of unitized sales where two or more coal owners in a checkerboard ownership pattern lease their coal jointly to a single lessee. Competition may be stimulated in this situation if access is assured in advance.

I recommend that we essentially retain the status quo with regard to access to coal leases, but that we consider the need for guaranteed access on a case by case basis. We will monitor the coal program as it is implemented with particular emphasis on the effect, if any, guaranteed access would play in improving competition, price, or attaining multiple use objectives. If strong and sufficient evidence does become available in the future to show that guaranteed access may be needed, then the question should be reopened.

Arnold E. Petty
Acting Associate

Enclosures

Encl. 1 Memo from Assistant Director, Energy and Mineral Resources, dated 6/3/80
Encl. 2 Memo from Assistant to the Director for Coal Management, with all attachments, dated 4/25/80

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Memorandum

To: Director (160)

From: Director, Denver Service Center

Subject: Wyoming Supreme Court Decision on Access to Federal Oil and Gas Exploration and Development, Coronado Oil Company (Appellant) vs. John A. Grieves, et al (Appellees)

The enclosed decision by the Wyoming Supreme Court ruled that an Oil Company has a right to condemn private property in order to obtain access to explore and develop a federal oil and gas lease. This decision is important in Wyoming because it answers the following questions.

1. Does an Oil Company have a right under state statutes to condemn for access to a federal oil and gas lease for exploration and development? Answer - yes.

2. Is "exploration for oil and gas" considered mining? Answer - yes.

3. Does a "mine truck haul road" allow for transportation of mining equipment and supplies as well as petroleum products? Answer - yes.

4. Is a general legal description of the property to be taken sufficient if the landowner refuses to allow plaintiffs on the ground to survey? Answer - yes.

As you are aware, the subject of individual states allowing mining companies to condemn for access to federal coal leases was discussed in the recent "Study of Guaranteed Access to Federal Coal Leases." The study found that Colorado also has a right of eminent domain for private companies in the mining business, although their state statute is much more restrictive than Wyoming's.

This is being sent to you to keep your office informed of latest developments concerning the question of guaranteed access to competitive coal leases. This month our office received two inquiries concerning this question from companies holding coal exploration licenses.

CONSERVE AMERICA'S ENERGY

cc:
WO-330
WO-510

Save Energy and You Serve America!

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